

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEW JERSEY

3 Case No. 2:14-cv-01770-JLL-JAD

4 Bank of Hope, as successor to
5 Wilshire Bank,
6 Plaintiff,
7 vs.

8 MIYE CHON, a/k/a Karen Chon,
9 SUK JOON RYU, a/k/a James S.
10 Ryu, TAE JONG KIM,
11 BERGENFIELD BAGEL & CAFE INC.,
12 d/b/a Cafe Clair,
13 MAYWOOD BAGEL INC., UB'S
14 PIZZA & BAGEL INC., UB'S
15 BAGEL & CAFE INC., and UBK
16 BAGELS CORP., d/b/a Franklin
17 Bagels & Cafe,
18 Defendants.

19 AND

20 SUK JOON RYU, a/k/a James S. Ryu,
21 Counterclaim Plaintiff,
22 vs.

23 BANK OF HOPE, a successor to
24 Wilshire Bank,
Counterclaim Defendant.

16
17 Oral Deposition of ALICIA LEE,
18 taken on behalf of the Defendants, at 316
19 West Second Street, Suite 200, Los Angeles,
20 California, on Friday, September 29, 2017,
21 at 9:55 a.m., before Maria Isabel DeLuna,
22 a Court Reporter and Notary Public
23 pursuant to notice.

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EXAMINATION INDEX

2

ALICIA LEE
BY MR. DZARA DIRECT

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EXHIBIT INDEX

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1	<p>THE REPORTER: Pursuant to Federal</p> <p>2 Rules of Civil Procedure, I am required to</p> <p>3 state the following: My name is Isabel</p> <p>4 DeLuna. My business address is 14520 Sylvan</p> <p>5 Street, Van Nuys, California 91411.</p> <p>6 This is the deposition of Alicia</p> <p>7 Lee in the matter of Bank of Hope,</p> <p>8 et al., versus Miye Chon, et al., at 9:56</p> <p>9 a.m. on September 29, 2017.</p> <p>10 This deposition is taking place at</p> <p>11 the offices of Personal Court Reporters at</p> <p>12 316 West Second Street, Suite 200, Los</p> <p>13 Angeles, California 90012.</p> <p>14 Counsel, will you state your</p> <p>15 appearances for the record.</p> <p>16 MR. DZARA: David Dzara for James</p> <p>17 Ryu.</p> <p>18 MR. YI: Michael Yi for plaintiff</p> <p>19 Bank of Hope and the two third-party</p> <p>20 defendants.</p> <p>21 ALICIA LEE, having been first</p> <p>22 duly sworn by the reporter, was examined</p> <p>23 and testified as follows:</p> <p>24 EXAMINATION</p>	<p>1 shake, so you need to give your answers</p> <p>2 orally and loud enough so that she can</p> <p>3 hear you clearly.</p> <p>4 Do you understand?</p> <p>5 A Yes, I do.</p> <p>6 Q Please let me finish asking my</p> <p>7 question before you begin your answer. If</p> <p>8 Mr. Yi has an objection to my question,</p> <p>9 wait until he's finished with his objection</p> <p>10 before you start your answer; is that</p> <p>11 okay?</p> <p>12 A Yes.</p> <p>13 Q If you don't understand one of my</p> <p>14 questions, please let me know, and I'll</p> <p>15 try to rephrase it. Otherwise, I'll</p> <p>16 presume that you understood the question</p> <p>17 fully and answered it truthfully; is that</p> <p>18 okay?</p> <p>19 A Yes.</p> <p>20 Q It's possible that you'll give an</p> <p>21 answer as completely as you can and then</p> <p>22 later on you'll remember additional</p> <p>23 information and you may want to clarify or</p> <p>24 add to an earlier response. If that</p>
	Page 6	Page 8
1	<p>1 BY MR. DZARA:</p> <p>2 Q Good morning, Ms. Lee. I'm going</p> <p>3 to put the volume up because I'm having</p> <p>4 some trouble hearing.</p> <p>5 A I'll try to speak up.</p> <p>6 Q Okay. Good morning. I am going</p> <p>7 to introduce myself again. My name is</p> <p>8 David Dzara. I represent James Ryu in</p> <p>9 this matter, and I'll be taking your</p> <p>10 deposition today. So I'm going to go over</p> <p>11 some ground rules first, and then we'll</p> <p>12 start with some questions.</p> <p>13 First, I'm going to -- well, in</p> <p>14 the deposition, I'll ask you questions</p> <p>15 pertaining to this lawsuit, and my</p> <p>16 questions and your answers will be</p> <p>17 recorded by the court reporter who has</p> <p>18 placed you under oath.</p> <p>19 Do you understand that?</p> <p>20 A Yes, I do.</p> <p>21 Q The court reporter is</p> <p>22 transcribing everything that is said, so</p> <p>23 it's important that you speak clearly. She</p> <p>24 won't be able to record a nod or a head</p>	<p>1 happens, just let me know that you would</p> <p>2 like to supplement one of your earlier</p> <p>3 answers and we can do that then while it's</p> <p>4 on your mind; is that okay?</p> <p>5 A Yes.</p> <p>6 Q Also it's possible when you're</p> <p>7 answering, you may think of some documents</p> <p>8 that might help you remember the answer or</p> <p>9 that might help you give a more accurate</p> <p>10 answer. If you do, please let me know</p> <p>11 because I might have the documents here</p> <p>12 and I'll be able to send them to you which</p> <p>13 would hopefully help you answer the</p> <p>14 question completely and accurately; is</p> <p>15 that okay?</p> <p>16 A Yes.</p> <p>17 Q If you need to take a break at</p> <p>18 any time for any reason, you should tell</p> <p>19 me and we'll finish your answer if you're</p> <p>20 in the middle of it and then we can take a</p> <p>21 break; is that okay?</p> <p>22 A Yes.</p> <p>23 Q Are you taking any medication or</p> <p>24 drugs, whether prescription or</p>

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<p>1 over-the-counter or otherwise, that might 2 make it difficult for you to understand 3 and answer my questions today?</p> <p>4 A No.</p> <p>5 Q Have you had any alcohol to drink 6 in the last 24 hours?</p> <p>7 A No.</p> <p>8 Q Are you sick today or under a 9 doctor's care for an illness?</p> <p>10 A Could you repeat that again?</p> <p>11 Q Are you sick today or under a 12 doctor's care for any illness?</p> <p>13 A No.</p> <p>14 Q Okay. Is there any reason you 15 can think of why you will not be able to 16 answer my questions fully and truthfully 17 today?</p> <p>18 A No.</p> <p>19 Q Have you ever been involved in a 20 lawsuit before?</p> <p>21 A Have I been involved in a lawsuit 22 myself? No.</p> <p>23 Q Okay. Have you ever been deposed 24 before or given testimony?</p>	<p>1 Q So you were deposed once before. 2 So you generally understand how the 3 deposition -- a deposition works?</p> <p>4 A Yes.</p> <p>5 Q Okay. Great. What did you do to 6 prepare for today's deposition?</p> <p>7 A I met briefly with Michael Yi to 8 go over the deposition.</p> <p>9 Q Okay. When did you meet with Mr. 10 Yi?</p> <p>11 A I met Wednesday.</p> <p>12 Q Okay. How long did you meet with 13 Mr. Yi?</p> <p>14 A I met with him for several hours.</p> <p>15 Q And did you review any documents 16 during the meeting?</p> <p>17 A Yes.</p> <p>18 Q And what documents -- do you 19 remember what documents you reviewed?</p> <p>20 A There were some e-mails that were 21 -- that I sent to my boss and --</p> <p>22 Q Who's your boss?</p> <p>23 A My boss, Elaine Jeon.</p> <p>24 Q And did you review any other</p>
Page 10	Page 12
<p>1 A Yes.</p> <p>2 Q How many times?</p> <p>3 A Once.</p> <p>4 Q And was it a deposition, or did 5 you testify in court?</p> <p>6 A It was a deposition.</p> <p>7 Q Okay. Were you just a witness?</p> <p>8 A Yes.</p> <p>9 Q And just, generally, what was the 10 matter -- why were you deposed?</p> <p>11 A It was a case from my old job. It was at Hanmi Bank almost about ten 13 years ago.</p> <p>14 MR. YI: She's referring to Hanmi 15 Bank. For the record, H-a-n-m-i.</p> <p>16 BY MR. DZARA:</p> <p>17 Q And what -- why were you -- do 18 you know what the nature of the case was 19 about?</p> <p>20 A It was an injury case on our 21 property.</p> <p>22 Q Okay. And you were a witness to 23 it?</p> <p>24 A Yes.</p>	<p>1 documents other than e-mails that you sent 2 to Ms. Jeon?</p> <p>3 A Well, there were other documents 4 probably from our internal auditor, Mr. 5 Orest.</p> <p>6 Q Okay.</p> <p>7 MR. YI: Is that Mr. Hamersky?</p> <p>8 THE WITNESS: Yes, Mr. Orest 9 Hamersky.</p> <p>10 MR. YI: And just -- David, I'm 11 sorry to interrupt. Do you have the 12 spelling for Elaine Jeon?</p> <p>13 THE REPORTER: No.</p> <p>14 MR. YI: J-e-o-n. Elaine --</p> <p>15 MR. DZARA: Can we go off the 16 record for a minute?</p> <p>17 (A discussion was held off the 18 record.)</p> <p>19 BY MR. DZARA:</p> <p>20 Q So Ms. Lee, you said you looked 21 at documents -- audit documents that were, 22 I guess, maybe written or drafted by Mr. 23 Hamersky as part of your deposition prep; 24 is that correct?</p>

	Page 13	Page 15
1	A Yes, uh-huh.	you leave Bank of Hope?
2	Q Okay. Do you remember what those	A I left Bank of Hope February 2016.
3	documents were? Were they reports? Were	Q And you've been with Commonwealth
4	they spreadsheets?	Business Bank since then?
5	A They were all spreadsheets.	A I've been with Commonwealth
6	Q Did you review any audit reports	Business Bank since March 1st, 2016.
7	as part of your deposition preparation?	Q And why did you leave -- I guess
8	A No. Not all of the reports, no.	it was still Wilshire Bank at the time.
9	Q Okay. Did you review your -- the	Why did you leave Wilshire Bank?
10	FBI memo of their interview with you?	A I left Wilshire Bank because I
11	A Well, I did not see the document.	was offered a better position at
12	It was read to me.	Commonwealth Business Bank.
13	Q It was read to you?	Q And what is your position there,
14	A Yes.	then?
15	Q Okay. You didn't actually read	A The current SVP and chief
16	it, but the contents were read to you by	operations administrator.
17	Mr. Yi?	Q Is that equivalent to what Elaine
18	A Yes.	Jeon's position is at Bank of Hope?
19	Q Did you do anything else other	A Was, yes.
20	than what you just testified about in	Q Okay. So you do -- just to
21	preparation for your deposition today?	recap, you didn't talk to anybody at Bank
22	A No, I don't think I did anything	of Hope about your deposition today;
23	else.	correct?
24	Q Did you talk to anybody -- I	A No.
	Page 14	Page 16
1	don't want to know what you discussed with	Q And the only -- you did talk to
2	Mr. Yi, but did you talk to anybody else,	your CEO at your current job about your
3	any other Bank of Hope employees about	deposition today; correct?
4	your deposition today?	A Yes.
5	A No.	Q And it was just that you needed a
6	Q Did you have to get permission	day off because you were getting deposed?
7	from Mr. Jeon to attend today's	A Yes.
8	deposition?	Q Did you discuss your deposition
9	A No.	with anybody else --
10	Q Did you talk to anybody outside	A No.
11	of Bank of Hope about your deposition	Q -- anybody?
12	today?	What is your date of birth?
13	A Yes.	A My date of birth is May 16, 1969.
14	Q Who did you talk to?	Q And are you married?
15	A I talked to my current CEO. Her	A Yes.
16	name is Joanne Kim from Commonwealth	Q And how long have you been
17	Business Bank. I had to take the day off,	married?
18	so I had to let her know.	A Almost 20 years.
19	Q Okay. Where do you work right	Q Have you ever been divorced?
20	now?	A No.
21	A I work at Commonwealth Business	Q Do you have any children?
22	Bank.	A Yes, I have three.
23	Q Oh, okay. I'm sorry. I thought	Q And how old are they?
24	you were still with Bank of Hope. When did	A They are 17, 15, and 4.

	Page 17	Page 19
1	Q 17, 15 and 4?	1 state schools.
2	A Yes.	2 Q Oh, okay. So where were you when
3	Q Wow. Okay. And where were you	3 you ended up graduating from high school?
4	born?	4 Where were you living?
5	A I was born in South Korea.	5 A I was in California. I graduated
6	Q Were you born -- what city?	6 from Glendale High School.
7	A I don't exactly recall the city,	7 Q And did you attend college?
8	but it's Seoul, Korea.	8 A Yes.
9	Q Seoul?	9 Q Where did you attend?
10	A Yeah.	10 A I attended Glendale College, and
11	Q Okay. I think everybody I've	11 I transferred to Cal State Northridge, and
12	asked in this case who is Korean, they all	12 I completed my studies at the University
13	say they were born in Seoul.	13 of Phoenix.
14	And when did you come to the	14 Q University of Phoenix?
15	United States?	15 A Yes, uh-huh.
16	A I came to the United States in	16 Q So do you have -- do you have a
17	1986.	17 bachelor's degree?
18	Q So you were about 17 at that time?	18 A Yes, I do.
19	A Yes.	19 Q And what is it in?
20	Q And did you attend high school in	20 A In business administration.
21	Korea -- South Korea?	21 Q And what year did you finally
22	A No, I did not attend high school	22 receive your BA in business administration?
23	in South Korea.	23 A Oh, I received it after I had my
24	Q Did you attend high school here	24 son, so it was -- I don't have the exact
	Page 18	Page 20
1	in the United States?	1 date, but it was in January after --
2	A I did attend high school in the	2 Q What year approximately?
3	United States, yes.	3 A When was Joshua born? 2014.
4	Q Okay. And when you moved to the	4 Q So you said you attended Glendale
5	United States, where did you move to?	5 College and then transferred to Cal State
6	A I came to Los Angeles in --	6 Northridge --
7	Q And you've been in --	7 A Yes.
8	A I'm sorry.	8 Q -- but didn't complete your
9	Q Sorry. Keep going.	9 degree then.
10	A I've been in Los Angeles in	10 What year did you -- what year
11	nearby Koreatown. I don't know the exact	11 did you stop your education at Cal State
12	address.	12 Northridge?
13	Q Have you lived in the Los Angeles	13 A I don't have the exact date, but
14	area your whole time here in the United	14 it was in the '90s.
15	States?	15 Q Okay. So were you working at all
16	A No. I left Los Angeles two	16 anywhere while you were going to Glendale
17	months after I arrived. I went to New	17 College or Cal State Northridge?
18	York, and I stayed about -- there for	18 A Yes. I was working at Hanmi Bank.
19	about six months, and then I moved to	19 Q And what were you doing at Hanmi
20	Colorado. And from Colorado, I moved back	20 Bank?
21	to Los Angeles.	21 A I started as a filing clerk, and
22	Q So where did you attend high	22 I worked my way up to operations officer.
23	school? What city?	23 Q What year did you start at Hanmi
24	A I attended all three different	24 Bank?

	Page 21	Page 23
1	A I started in January of 1992.	1 you got into operations, what were your
2	Q And was that your first job after	2 duties as an operations employee?
3	school -- or I guess, was that, like, your	3 A You mean as an operations officer?
4	first real job?	4 Q Yes. From when you got the
5	A Well, if you say "real job," does	5 operations officer and became VP of
6	working for my dad counts as a real job?	6 operations officer, what were your primary
7	Q Okay. I meant real like, you	7 duties?
8	know, you were -- how old were you in	8 A Primary duty was to supervisor
9	1992? You were 23?	9 tellers, new account representatives, and
10	A Yes, uh-huh.	10 customer service clerks and help them,
11	Q So you were still -- were you in	11 guide them throughout their day-to-day
12	college?	12 daily operations.
13	Were you still attending	13 Q Okay. Have you ever received any
14	Glendale or Cal State Northridge while you	14 accounting training?
15	started at Hanmi Bank?	15 A What do you mean? Accounting
16	A Yes. I was still attending	16 training such as --
17	Glendale College when I started working	17 Q Like, did you ever take any
18	for Hanmi Bank.	18 classes in accounting?
19	Q Okay. Were you part time at	19 A Yes.
20	Hanmi, or were you full time when you	20 Q You did?
21	started?	21 A Yes, I did.
22	A I started as part time, and I was	22 Q Okay. Where was that?
23	full time later on.	23 A I did take accounting classes at
24	Q Okay. Do you know approximately	24 University of Phoenix.
	Page 22	Page 24
1	when you started to be full time?	1 Q Okay. How about -- did you ever
2	A I think it was the same year that	2 have any investigation training?
3	I started. It was towards the end, though.	3 A No, not investigation training.
4	Q Okay. So you started as a clerk.	4 If you're talking about separate process,
5	And what other positions did you	5 no.
6	hold while you were at Hanmi as you got	6 Q Okay. How about other than
7	promoted?	7 classes, do you have any other -- did you
8	A Well, I was a teller -- merchant	8 go to any other training for your job?
9	teller, customer service representative,	9 Any presentations or any extra educational
10	new account representative, supervisor	10 stuff?
11	officer, AVP, and I went up to vice	11 A Yeah. We have a regular -- what
12	president operations officer.	12 we call BCG seminars, bank compliance
13	Q And do you know what year you	13 group, trainings that we have. And there
14	became the vice president operations	14 are several in a year that I have to
15	officer?	15 attend, to.
16	A I don't have the exact date.	16 Q You said "we." Who is we?
17	Sorry.	17 A "We" as all the operations staff
18	Q Do you know what year,	18 that works at the bank.
19	approximately?	19 They have their -- the bank
20	A Approximately -- it's not exact	20 offer that kind of training for employees.
21	date -- probably around 2005 or 2004.	21 So I choose go to trainings that are
22	Q Okay. That's fine. And what	22 relevant to my job.
23	were your duties? Obviously, I know what a	23 Q And these are internal trainings
24	clerk does and a teller, I think. But as	24 by the bank that you're working in?

	Page 25	Page 27
1	A No. They are provided by lawyers.	1 held at -- during your employment at
2	Q Okay. So the lawyers come.	2 Wilshire Bank?
3	Were the trainings at the bank?	3 A Well, before I became the
4	A No.	4 operation admin manager, I was FVP and ops
5	Q Like, lawyers came in from the	5 admin officer. So it could be three
6	outside and did training at the bank?	6 titles; right?
7	A No. We go to the hotels, the	7 Q I think we got two.
8	conference centers that they have the	8 You said you started as VP
9	trainings at.	9 operations administrative officer, and
10	Q And you said you do that a couple	10 then you got promoted to FVP operations
11	times a year?	11 administrative
12	A Yes.	12 manager. Is that it?
13	Q So when did you -- did you leave	13 A Well, I got promoted when I left
14	Hanmi Bank?	14 Wilshire Bank. But between those, there's
15	A Yes, I left Hanmi Bank.	15 one more title. That is -- first vice
16	Q What year?	16 president and ops admin officer. Sorry
17	A I left in 2006.	17 about that.
18	Q And where did you go?	18 Q You said when you left Wilshire
19	A I was trying to help my dad with	19 Bank. What do you mean when you left
20	his business for a while, but it didn't	20 Wilshire Bank?
21	work out.	21 A To take my job on my current
22	Q So what was your next job after	22 position as --
23	trying to help your dad's business?	23 Q Okay. I'm not talking about
24	A It was with Wilshire Bank.	24 that. I'm just restricting -- we're just
	Page 26	Page 28
1	Q And when did you start at	1 going to talk about Wilshire Bank, your
2	Wilshire?	2 job there.
3	A I started Wilshire on February	3 A Right.
4	1st of 2007.	4 Q So you started at Wilshire Bank
5	Q You said February 1st, 2007?	5 in 2007 as VP operations administrative
6	A Yes.	6 officer; right?
7	Q What was your father's business	7 A Yes.
8	that you said you tried to help out?	8 Q And then were you promoted at
9	A My dad had a wholesale business	9 Wilshire Bank?
10	of luggage and bags.	10 A Yes.
11	Q So why -- did you leave Hanmi	11 Q And you were promoted to what?
12	Bank to try to help your dad's business?	12 A First vice president and
13	That's the reason why you left?	13 operations administrative officer.
14	A Yes.	14 Q And those are the only two titles
15	Q Okay. What was your position	15 you held at Wilshire Bank?
16	when you first started at Wilshire Bank?	16 A No. There's another one which is
17	A I was VP and operations	17 first vice president and ops admin manager.
18	administrator officer.	18 Q You held that title at Wilshire
19	Q Is that the title you held your	19 Bank?
20	entire time at Wilshire Bank?	20 A Yes.
21	A Was that the title that I held?	21 Q Got it. Okay. Were your duties
22	No. I was promoted to FVP and ops admin	22 the same for all three positions, or were
23	manager.	23 they different?
24	Q So those are the two titles you	24 A They're a little bit different.

	Page 29	Page 31
1 Q Okay. Tell me -- let's say the 2 first one, the VP of operations 3 administrative officer, what were your 4 duties in that position? 5 A That position, I was mainly going 6 around branches finding out whether their 7 daily procedure was followed and reviewing 8 their daily procedures and making 9 corrections if they needed to. And I 10 would write reports to my boss in regards 11 to, you know, how the review went with all 12 the branches. 13 Q And were all the branches in 14 Southern California? 15 A No. We had branches at Texas, 16 New York, and New Jersey. 17 Q And you had to travel to all of 18 them? 19 A Yeah, I would travel a couple of 20 times a year. 21 Q And who was your boss at that 22 time in that position? 23 A At that time in that position, my 24 boss -- my direct boss was Sora Park, and	1 position? 2 A I would say around -- during 2010 3 or '11. 4 Q Okay. And what were your duties 5 in that position? 6 A I was to manage my direct reports 7 who were in charge of all the duties that 8 I was doing before. 9 Q Keep going. 10 A Yeah. I had -- I had a group of 11 people that were taking over some of the 12 duties that I had been performing before, 13 and I had to manage those operations 14 administrative officers as well. 15 Q Okay. And did you -- you left 16 Wilshire Bank before it merged with Bank 17 of Hope -- 18 A Yes. 19 Q -- or merged and became Bank of 20 Hope? 21 A Yes. 22 Q Where was your office while you 23 worked at Wilshire Bank? 24 A My office was at 3200 Wilshire	
	Page 30	Page 32
1 above that was David Kim. 2 Q Okay. 3 A He's the chief. 4 Q What year -- you said your next 5 position was FVP, operations 6 administrative officer. 7 A Yes. 8 Q Do you remember what year you 9 were promoted to that? 10 A I don't recall the exact dates 11 when I was promoted. I'm sorry. 12 Q That's fine. No need to 13 apologize. 14 What were your duties in that 15 position? 16 A Well, it was pretty much the 17 same. It's just that I was also involved 18 in adjusting our day-to-day procedures for 19 our branch operations and providing 20 guidance of their day-to-day operations as 21 well. 22 Q Okay. And the third position, 23 FVP operations administrative manager, do 24 you remember when you got promoted to that	1 Boulevard, seventh floor, Los Angeles 90010. 2 Q Was that Wilshire's headquarters? 3 A Yes, sir, uh-huh. 4 Q So you were there the whole time? 5 A Yes. 6 Q That was your office the entire 7 time? 8 A Yes. 9 Q Other than, obviously, you were 10 traveling for part of that time -- 11 A Yes. 12 Q -- that was your primary office? 13 A Yes. 14 Q And when did Elaine Jeon become 15 your boss? What position did you have when 16 Elaine became your boss? 17 A I was the first vice president of 18 operations administrative officer, and I 19 believe she took -- she became my boss 20 around 2010. 21 Q And you said your reason for 22 leaving Wilshire Bank was because you were 23 offered a better position at Commonwealth 24 Business Bank; correct?	

	Page 33	Page 35
1	A Right.	1 Boulevard, seventh floor, Los Angeles,
2	Q And is Commonwealth Business Bank	2 California 90010.
3	a Korean American bank too?	3 Q Is that right down the street
4	A Yes.	4 from your old office?
5	Q Okay. Is it much smaller than	5 A Yeah, couple of blocks down.
6	Wilshire Bank?	6 Q Okay. Do you know my client,
7	A Yes.	7 James Ryu?
8	Q Okay. Seems like what I've been	8 A No, I don't. Never met him.
9	reading or learned from this case is that	9 Q Okay. That was my next question.
10	there's a lot of banks buying each other	10 Did you ever meet him?
11	up?	11 A No, I never met him.
12	A Right.	12 Q Did you ever talk to him on the
13	Q I guess -- I mean, the Korean	13 phone or --
14	American bank industry, it seems like	14 A No.
15	that's, you know, similar in the nonKorean	15 Q Did you ever talk to him on the
16	American banking and the regular American	16 phone?
17	banking too. Just an observation, not a	17 A No.
18	question.	18 Q Did you ever exchange e-mails
19	When you were hired at Wilshire	19 with him?
20	Bank, who was -- who did you interview with,	20 A No.
21	if you remember?	21 Q How about Karen Chon? Do you
22	A I interviewed with David Kim.	22 know her?
23	Q And what was his position at the	23 A I met her when I was at New York
24	time?	24 for the interview, but I had never met her
	Page 34	Page 36
1	A He was the chief operation	1 before.
2	administrator.	2 Q Okay. We'll talk about the
3	Q Anybody else?	3 interview of her. That was in New Jersey,
4	A And the CEO.	4 though, wasn't it?
5	Q And who was that at the time?	5 A Yeah, in New Jersey.
6	A Mr. Soo Bong Min.	6 Q So you only met her once, that
7	Q Okay. In your position now with	7 one time?
8	Commonwealth Business Bank -- I forgot if	8 A Once.
9	I asked you before, but what are your job	9 Q You never talked to her before on
10	responsibilities?	10 the phone or after?
11	A My job responsibility is to	11 A Never.
12	provide guidance for our branch operations	12 Q No e-mails with her ever?
13	and branch operations officers and also	13 A No e-mails.
14	supervise my manager -- our ops admin	14 Q Okay. You're aware that
15	department manager and ensure that the	15 BankAsiana and Wilshire Bank merged in
16	day-to-day operation is smooth.	16 October of 2013; right?
17	Q And how many branches does	17 A Yes, I do.
18	Commonwealth have?	18 Q Were you involved, at all, in
19	A We currently have eight.	19 that merger process?
20	Q Are they all in Los Angeles?	20 A No. Actually, I was on maternity
21	A No. We have two in Texas and the	21 leave at the time.
22	rest in California.	22 Q Oh, your four-year-old?
23	Q And where is your office now?	23 A Yes.
24	A My office is at 3445 Wilshire	24 Q Didn't do the math.

	Page 37	Page 39
	<p>1 A Yeah.</p> <p>2 Q If you weren't on maternity</p> <p>3 leave, would you have been involved, at</p> <p>4 all, in the merger process?</p> <p>5 A Yes.</p> <p>6 MR. YI: Objection to form.</p> <p>7 BY MR. DZARA:</p> <p>8 Q Okay. Have you ever been</p> <p>9 involved -- when you were at Wilshire</p> <p>10 Bank, were you involved in any other</p> <p>11 mergers?</p> <p>12 A An acquisition, yes.</p> <p>13 Q Okay. And what -- what was your</p> <p>14 role in the acquisition process? What was</p> <p>15 your role?</p> <p>16 A I was involved in transferring,</p> <p>17 ensuring that all the data for our deposit</p> <p>18 side were correct. And that if we were to</p> <p>19 convert all the data from the previous --</p> <p>20 banks that we were acquiring to be</p> <p>21 correctly encoded in our system.</p> <p>22 Q Okay. Do you know who was</p> <p>23 responsible for that function in the</p> <p>24 BankAsiana acquisition?</p>	<p>1 Q Do you know if she was involved</p> <p>2 in the BankAsiana acquisition?</p> <p>3 A I wouldn't know that. I don't</p> <p>4 know the answer to that, no.</p> <p>5 Q Okay. Are you aware that certain</p> <p>6 BankAsiana employees were laid off</p> <p>7 following the merger?</p> <p>8 A Yeah. I was told later, yes.</p> <p>9 Q You were aware of that?</p> <p>10 A Yes, uh-huh.</p> <p>11 Q Okay. Do you know that James was</p> <p>12 one of the employees laid off?</p> <p>13 A Yes.</p> <p>14 Q Okay. And do you know that Karen</p> <p>15 was also one of the employees that was</p> <p>16 laid off?</p> <p>17 A Yes.</p> <p>18 Q And do you know how you learned</p> <p>19 about that -- how you learned that they</p> <p>20 were both laid off?</p> <p>21 A I learned after the merger and</p> <p>22 acquisition was completed and when I came</p> <p>23 back to work.</p> <p>24 Q Okay. When did you come back to</p>
	Page 38	Page 40
	<p>1 A Could you repeat that question?</p> <p>2 I didn't catch.</p> <p>3 Q Sure. You just described your</p> <p>4 role in a prior acquisition when you are</p> <p>5 at Wilshire Bank.</p> <p>6 A Right.</p> <p>7 Q But you testified you weren't</p> <p>8 involved in the acquisition of BankAsiana;</p> <p>9 correct?</p> <p>10 A Correct.</p> <p>11 Q So who was -- who handled for</p> <p>12 Wilshire Bank the functioning that you</p> <p>13 just described that you handled in the</p> <p>14 prior acquisition for Wilshire Bank?</p> <p>15 A At that time, was my colleague,</p> <p>16 Julie Ki.</p> <p>17 Q Julie Ki, K-i?</p> <p>18 A K-i.</p> <p>19 Q What was her position back then,</p> <p>20 do you know? Her title?</p> <p>21 A She was first vice president and</p> <p>22 ops admin officer.</p> <p>23 Q So was she a step below you?</p> <p>24 A Yes.</p>	<p>1 work following maternity leave?</p> <p>2 A I came back to work sometime in</p> <p>3 November.</p> <p>4 Q Of 2013?</p> <p>5 A Yes.</p> <p>6 Q So after you returned to work,</p> <p>7 you learned, I guess, about the merger and</p> <p>8 part of what you learned is that James and</p> <p>9 Karen were two of the BankAsiana employees</p> <p>10 that were laid off?</p> <p>11 A Yes, uh-huh.</p> <p>12 Q Okay. We're going to spend,</p> <p>13 really, the rest of the deposition talking</p> <p>14 about the embezzlement and Wilshire bank's</p> <p>15 investigation and your role in that.</p> <p>16 So when did you first learn about</p> <p>17 Karen's embezzlement from BankAsiana?</p> <p>18 MR. YI: Objection to form.</p> <p>19 BY MR. DZARA:</p> <p>20 Q You can answer.</p> <p>21 A I believe I learned when Elaine</p> <p>22 Jeon forwarded me an e-mail from Bo Young</p> <p>23 saying that there was some discrepancies</p> <p>24 that they found. And I don't exactly know</p>

	Page 41	Page 43
	<p>1 that's when I learned about the incident. 2 Q Okay. So you learned about -- 3 you received -- Ms. Jeon forwarded an 4 e-mail from, you think, Bo Young that 5 talked about the discrepancies? 6 A Yes, uh-huh. 7 Q And did you -- after receiving 8 that e-mail, did you talk to anybody about 9 it? 10 A After receiving that, no. Only 11 to my boss, Elaine Jeon. 12 Q Only to Ms. Jeon? 13 A Yes, uh-huh. 14 Q And what did you guys discuss? 15 A She wanted me to go to New York 16 and find out what's going on and get a 17 report. 18 Q Anything else -- 19 A I think that was -- 20 Q -- that you remember? 21 A I think that's all that I can 22 remember right now. 23 Q Okay. Did you talk to Bo Young 24 before you left?</p>	<p>1 going on? 2 A Yes. 3 Q When did you leave for New 4 Jersey, that night or the next morning? 5 A I think I arranged a flight, and 6 I don't know exact time, but I packed at 7 night, I remember. 8 Q Did you take a red eye? 9 A I think -- I believe I took the 10 red eye. 11 Q Got it. And you still had your 12 newborn at home; right? 13 A Yes, uh-huh. 14 Q Okay. Bad time -- bad timing? 15 A Yeah. 16 Q Okay. So you think you took a 17 red eye that night. 18 When you -- all you knew -- what 19 did you know at the time you took the 20 flight to New Jersey? 21 What did you know about the 22 embezzlement, specifically? 23 A I knew that there was some 24 discrepancy that was discussed by a</p>
	<p>1 A I don't know. I don't remember. 2 I might have. 3 Q Okay. Well, I don't want you to 4 guess. Whatever you remember is what you 5 remember. 6 A I don't remember. 7 Q You know, I'm not -- I prefer 8 that you not -- yeah, you can -- I don't 9 want to speculate or guess. If you 10 remember something -- 11 A Of course. 12 Q -- that's all I'm going to ask. 13 If you don't recall or you don't remember, 14 it's perfectly fine to say "I don't 15 recall," "I don't remember." I'm not 16 trying to trick you here. I'm sure 17 Michael told you I was a great guy, and 18 I'm not trying to be mean or trick you into 19 saying something that you don't believe or 20 you don't remember. 21 So you remember talking to Ms. 22 Jeon after receiving that e-mail, and you 23 remember her telling you she wanted you to 24 go to New Jersey and figure out what's</p>	<p>Page 42</p> <p>1 customer, and the branch staff was 2 contacted about that. And while the 3 branch staff was looking into the system, 4 they found something unusual. So Bo 5 Young started digging into the account 6 history, and she believed that there were 7 some transactions that she felt was 8 unusual because it was funds transferred 9 from one CD to another CD which had no 10 relation to each other. 11 Q So how did you learn all that? 12 Do you remember how you learned 13 all that? 14 A It was provided on the 15 spreadsheet that was attached to the 16 e-mail that was sent to Elaine Jeon. 17 Q Were you aware of any meeting 18 between Bo Young, Irene Lee, and Karen 19 prior to you leaving to go, to fly to New 20 Jersey? 21 A No, I wasn't aware. I had no 22 knowledge of that meeting. 23 Q Okay. Did you later become aware 24 that there was a meeting the day before</p>

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<p>1 you got to New Jersey between Karen, Bo 2 Young, and Irene?</p> <p>3 A I wasn't aware there was a 4 meeting, but I could tell they did talk 5 about. I don't know whether they had met 6 in person or were over the phone. I don't 7 know that.</p> <p>8 Q Okay. Just tell me anything that 9 you remember about a possible meeting or a 10 discussion between Karen, Irene, and Bo 11 Young prior to you arriving.</p> <p>12 A Prior to my arrival, I wasn't 13 aware of it, that they had a meeting.</p> <p>14 Q Did you learn after the fact -- 15 after you arrived?</p> <p>16 A After I arrived during the 17 meeting, there were some mentions that 18 they had talked, but I wasn't sure whether 19 they met in person or not. That's all I 20 can remember.</p> <p>21 Q Okay. Do you have the exhibits 22 there in front of you guys? Can you take 23 the top one. All right. The first 24 document here -- the first exhibit I'm</p>	<p>1 remember seeing it?</p> <p>2 A I don't remember seeing this.</p> <p>3 MR. DZARA: Okay. How about -- 4 let's take a look at the next one that's 5 in the stack, Michael.</p> <p>6 MR. YI: Okay.</p> <p>7 MR. DZARA: It's not marked.</p> <p>8 BY MR. DZARA:</p> <p>9 Q Okay. Ms. Lee, it's Bates- 10 numbered WB 1578, and correct me if I'm 11 wrong, but if --</p> <p>12 MR. YI: Hold on. David, if you 13 allow a moment, I'm just telling the 14 witness that she doesn't have to pay 15 attention to the production number which is 16 on a yellow Post-it.</p> <p>17 MR. DZARA: Got it.</p> <p>18 BY MR. DZARA:</p> <p>19 Q So my first question to you, have 20 you seen this e-mail before? Do you 21 recognize it?</p> <p>22 A It appears to be the memo that I 23 sent to Elaine Jeon on January 23rd.</p> <p>24 MR. DZARA: Okay. These things</p>
<p>1 going to show you should be marked Ryu 2 2 in the bottom right-hand corner.</p> <p>3 A Yes.</p> <p>4 Q And it's Bates-numbered WB 1532. 5 I forget if it was marked at Bo Young's or 6 Irene's deposition. But first, I want you 7 to take a look at the e-mail and see if 8 you recognize it.</p> <p>9 A It seems to be an e-mail from Bo 10 Young to Elaine Jeon and Seung Ho Park in 11 regards --</p> <p>12 Q Copied to Irene Lee?</p> <p>13 A Yes, copied to Irene Lee.</p> <p>14 Q And who's -- Seung Ho Park, who 15 was that?</p> <p>16 A He was the regional director at 17 the time.</p> <p>18 Q He was the regional director?</p> <p>19 A Yes.</p> <p>20 Q For the east region, New Jersey 21 region?</p> <p>22 A Yes, for Wilshire Bank.</p> <p>23 Q Okay. Does anything in this e- 24 mail look familiar to you? Do you</p>	<p>1 might be out of order, Michael. This 2 isn't the e-mail from Elaine Jeon to 3 Alicia dated Wednesday January 22nd?</p> <p>4 MR. YI: Which one did you want 5 to do next? Which document?</p> <p>6 MR. DZARA: This one should be in 7 the order I attached them in the e-mail 8 that I sent to the court reporter. The 9 second one should be an e-mail from Elaine 10 Jeon to Alicia dated January 22nd, 2014, at 11 7:23 p.m.</p> <p>12 MR. YI: Okay. Got it.</p> <p>13 MR. DZARA: Off the record for a 14 second.</p> <p>15 (A discussion was held off the 16 record.)</p> <p>17 (Exhibit 36 was marked for 18 identification and is attached hereto.)</p> <p>19 BY MR. DZARA:</p> <p>20 Q Okay. Ms. Lee, so now you should 21 have in front of you, hopefully, what's 22 now going to be marked Ryu 36, 23 Bates-numbered WB 1578. And it should be 24 an e-mail from Elaine Jeon to you dated</p>

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<p>1 Wednesday, January 22nd, 2014, at 7:23 p.m. 2 Is that the document you have in 3 front of you? 4 A Yes, I do. 5 Q Okay. Take a look at it. My 6 first question is: Have you seen this 7 before? 8 A Yes. 9 Q Okay. So you testified before 10 that you received an e-mail from Elaine 11 that was your first -- was the first time 12 you learned about the embezzlement. 13 Is this the e-mail that you were 14 referring to before? 15 A Yes. 16 Q Okay. So if you're looking at 17 the prior exhibit that I showed you, which 18 is Ryu 2, the one I showed you before -- 19 A Yes. 20 Q -- this appears to be -- Elaine 21 seemed to have just forwarded the e-mail 22 that she received from Bo Young; is that 23 right? 24 A It seems to be.</p>	<p>1 Q And it goes on to kind of 2 describe what Karen told them -- "them" 3 being Irene and Bo Young -- about how 4 Karen -- how she was able to do the 5 stealing; is that right? 6 A Yes, uh-huh. 7 Q Okay. And then you'll see in the 8 next couple pages, there seem to be 9 printouts and spreadsheets of the affected 10 customers. 11 A Yes. 12 Q Does that look right? 13 A Yes. 14 Q Okay. So in anywhere on this e- 15 mail that Bo Young sent, do you see any 16 mention of James? 17 A No, I don't see any mention of 18 James. 19 Q Okay. Are you aware of -- you're 20 aware that Karen -- I'm going to use first 21 names for Karen and James just to make it 22 easier. Do you know -- you're obviously 23 aware that Karen implicated James in the 24 embezzlement?</p>
<p>1 Q Okay. So looking at Ryu 36, the 2 e-mail that Elaine forwarded to you, 3 you'll see the bottom -- the last 4 paragraph on the first page -- 5 A Yes. 6 Q -- it talks about Irene Lee and 7 Bo Young meeting with Karen Chon this 8 morning at Karen's request. 9 Do you see that? 10 A Yes, I see that. 11 Q Okay. So does that help -- you 12 said you didn't remember if there was a 13 meeting or when it was between Karen and 14 Irene and Bo Young. 15 Does this help you remember that 16 it was -- it was a meeting between the 17 three of them, and it was on January 22nd, 18 2014? 19 A Yes, uh-huh. 20 Q Okay. So in this paragraph, Bo 21 Young goes on to state that, in the second 22 sentence, that Karen had been stealing 23 money from the bank for the last few years. 24 A Yes, uh-huh.</p>	<p>1 A Yes. 2 Q Okay. Do you know if she 3 implicated James in the embezzlement 4 during this January 22nd, 2014, meeting 5 that she had with Irene and Bo Young? 6 A I don't. 7 Q You don't know? 8 A Could you repeat that? 9 Q Sure. Are you aware if Karen 10 implicated James during her meeting with 11 Irene and Bo Young on January 22nd, 2014? 12 A It appears to be that there's no 13 mention of James during that meeting -- 14 Q Okay. 15 A -- according to this e-mail. 16 Q Other than this document, what 17 you're looking at, do you have any 18 independent recollection -- do you know -- 19 A No. 20 Q -- for sure, one way or the 21 other, if Karen implicated James during 22 this January 22nd meeting? 23 A I don't have any knowledge of 24 that. I can't recall.</p>

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1	<p>Q Okay. You can set these two exhibits aside. Thank you.</p> <p>So regarding this January 22nd meeting, do you think -- have you told me everything you remember about it?</p> <p>A 22nd meeting with Elaine Jeon?</p> <p>Q Yeah.</p> <p>A Yes.</p> <p>Q Now, this January 22nd meeting between Bo Young and Irene and Karen, have you told me everything that you remember learning about that meeting?</p> <p>A Yes.</p> <p>Q And if you remember something else later, you're free to bring it up.</p> <p>A Yes.</p> <p>Q "I just remembered this."</p> <p>A Yes, of course.</p> <p>Q Thank you. So you arrive likely in the early morning hours. You arrive to New Jersey in the early morning hours of January 23rd, 2014?</p> <p>A Yes.</p> <p>Q Okay. What did you do? When you</p>	<p>should be the next one in the stack. It's marked Ryu 5.</p> <p>BY MR. DZARA:</p> <p>Q Okay. Ms. Lee, take a look at the exhibit that's been previously marked Ryu 5.</p> <p>A Yes.</p> <p>MR. YI: Go ahead, David.</p> <p>BY MR. DZARA:</p> <p>Q Okay. So this is kind of a repeat, the earlier e-mails in the string of the e-mails that we already looked at. The new e-mail in the string is the middle e-mail on the first page. It's an e-mail from Elaine Jeon to Bo Young and Irene copying Seung Ho Park.</p> <p>And in her e-mail -- it's dated January 22nd, 2014. And in the e-mail -- in the middle of the e-mail, she says that you are flying out there. You're going to be out there tomorrow morning to help out. Do you see that?</p> <p>A Yes.</p> <p>Q And she says -- the last line in</p>
1	<p>got in -- when you flew in -- did you fly into Newark?</p> <p>A Yes, I think I flew to Newark Airport.</p> <p>Q Okay. Do you remember what you did when you got in?</p> <p>Where did you go?</p> <p>A Well, I took the taxi and went to the headquarters of the BankAsiana -- the former BankAsiana which was on Broad Avenue where Bo Young was -- Bo Young Lee.</p> <p>Q Is that Palisades Park?</p> <p>A Yes, uh-huh.</p> <p>Q And what did you do when you got there?</p> <p>A When I got there, I met with Bo Young and we were getting ready to go and meet Karen.</p> <p>MR. DZARA: Let's go back a second. Michael, could you pull that next exhibit? I missed it for a second. It should be marked Ryu 5.</p> <p>MR. YI: Which one is it?</p> <p>MR. DZARA: The next one. It</p>	<p>the e-mail, "Let's focus to investigate thoroughly and do the follow-up procedure timely"; right?</p> <p>A Yes.</p> <p>Q Okay. Ms. Jeon asked you to fly out there to help investigate to figure out what's going on. That was the purpose of you going?</p> <p>A Yes.</p> <p>Q Was there any other instructions Ms. Jeon gave you other than that?</p> <p>A Well, I was instructed that I was supposed to meet with Karen and get as much information that we can from the interview and see -- find out which accounts and what was the reason, the motive and all that of the embezzlement.</p> <p>Q Okay. So you were supposed meet with Karen.</p> <p>Did you know if a meeting was set up with Karen the next day?</p> <p>A Yes.</p> <p>Q Okay. Who told you that there was a meeting already set up to meet with</p>

	Page 57	Page 59	
1	her again?	1 Jersey to do -- to start this 2 investigation? 3 A Because I was her direct report 4 and because my operations background, to 5 know the type of transaction -- to 6 identify certain transactions, I believe. 7 Q Okay. So it was because of your 8 background. It wasn't because of any 9 speciality in investigation work that you 10 have? It was just solely due to your 11 operations background? 12 A Yes. 13 Q Was anybody else other than you 14 considered to go and handle this 15 investigation? 16 A At my department by Ms. Jeon, or 17 are you talking about -- because I believe 18 Orest Hamersky was also put into the 19 investigation process. 20 Q Yeah. He came afterwards. But 21 I'm talking about this January 22nd e-mail 22 when everybody found out, when Bo Young 23 sent this e-mail to Elaine Jeon, was 24 anybody else considered to be sent other	Page 59
1	A Yes. I did talk to Jake Seo and 2 Julie Ki. The reason I talked to Jake Seo 3 was for him to provide me a list of the 4 transactions for anything that Karen may 5 have done during that period so that it 6 could help me in the investigation. 7 Q Okay. 8 A And I talked to Julie because she 9 was my subordinate, and she needed to take 10 over while I was gone. 11 Q Okay. So did you have -- do you 12 remember how you communicated with Jake 13 and Julie? Was it by e-mail or by phone? 14 A No. They are right -- we're on 15 the same floor, so I just walked over to, 16 you know, his cubicle office and talked to 17 him. 18 Q Okay. So it was in-person 19 meeting? 20 A Yes. It was in person. 21 Q In-person communication? 22 A Yeah. 23 Q Okay. And why were you -- why 24 did Elaine Jeon ask you to go to New	Page 58 than you? A No. Q Okay. You can set that aside. Thank you. So you knew about -- when you arrived on January 23rd, you went to Palisades Park, and you knew that you were going to be meeting with Karen, and you your objective was to interview her and get as much information as you could about what she did; is that right? A That's correct. Q Did you -- did you know anybody else who would be attending this meeting with Karen with you? A No. Q Like, I know Irene and Bo Young were there. A Yes. Q They were there? A Yes, uh-huh. Q Was anybody else there? A No, there was no one else there. Q Do you know why Irene and Bo	Page 60

	Page 61	Page 63
	<p>1 Young were there? Did you ask them to be 2 there?</p> <p>3 A No, I didn't ask them to be 4 there. But I believe they were there 5 because I had never met Karen, and I 6 couldn't have done the meeting by myself 7 because I wouldn't recognize her.</p> <p>8 Q And where did you meet?</p> <p>9 A It was in a coffee shop nearby 10 the office.</p> <p>11 Q Was it in the same building as 12 the office, or was it somewhere --</p> <p>13 A No. No. I remember driving a 14 short distance by car.</p> <p>15 Q And did you drive to the coffee 16 shop by yourself, or was Bo Young and 17 Irene with you?</p> <p>18 A No. Bo Young drove her car, and 19 I was -- I mean, in the car with her and 20 Irene Lee was also.</p> <p>21 Q Okay. So you three went in. 22 Was Karen waiting for you, or did 23 you guys have to wait for her to show up? 24 A I don't remember that, but I'm</p>	<p>1 Q How long -- do you remember how 2 long the meeting was?</p> <p>3 A I don't recall exactly. It could 4 have been a little more than an hour or so.</p> <p>5 Q Okay. Tell me, did anybody else 6 from Wilshire Bank attend the meeting 7 besides you, Irene, and Bo Young?</p> <p>8 A No one attended the meeting 9 besides us.</p> <p>10 Q And tell me what you remember 11 about what was discussed -- what was said 12 by Karen?</p> <p>13 A Well, to summarize, Karen 14 confessed to all these unauthorized 15 withdrawals of cash from the customers' 16 accounts. And during the confession, she 17 did mention Mr. James Ryu being involved 18 in it, and he was part -- he benefitted 19 from that. The funds -- the cash was 20 delivered to Mr. Ryu, and that's how she 21 had to deliver them, directly to him in an 22 interoffice envelope. And I think that's 23 pretty much what we discussed. 24 And I was concentrating in which</p>
	<p>1 sure we met.</p> <p>2 Q Okay. And did you record the 3 conversation with Karen?</p> <p>4 A Yes, I did.</p> <p>5 Q And you recorded it on your cell 6 phone?</p> <p>7 A Yes, uh-huh.</p> <p>8 Q Did you tell everybody that you 9 were going to be recording?</p> <p>10 A No, I didn't.</p> <p>11 Q Did anybody else know besides 12 you --</p> <p>13 A No.</p> <p>14 Q -- that you were recording?</p> <p>15 Did Elaine Jeon ask you to record 16 the conversation?</p> <p>17 A No, she didn't.</p> <p>18 Q So you decided to do it on your 19 own?</p> <p>20 A Yes, to make better notes.</p> <p>21 Q And did you use the recording to 22 take better notes after the meeting was 23 done?</p> <p>24 A No, I didn't.</p>	<p>1 Page 62</p> <p>2 accounts were those funds distributed or 3 if there were anyone else besides those 4 customers that were identified by Bo Young 5 and try to get confirmation about, you 6 know, the actual cash being withdrawn from 7 the vault.</p> <p>8 Q Okay. So did you ask a lot of 9 questions about who were the CD customers 10 she took money from? Were you asking a 11 lot of questions --</p> <p>12 A Yes.</p> <p>13 Q -- about the customers to try to 14 figure out which accounts were affected?</p> <p>15 A Yes.</p> <p>16 Q Okay. Was that your -- your 17 primary focus was to figure out the 18 customers and what accounts were affected?</p> <p>19 Was that your primary goal of the interview?</p> <p>20 A Yeah, that was my primary goal of the interview. But during the interview, 21 also there was information that someone 22 higher above was involved, and I was 23 trying to determine whether she was acting</p>

	Page 65	
1	on her own or whether she was instructed 2 to do it, so I was asking a lot of 3 questions in regards to that. 4 Q Okay. And did she say -- do you 5 remember what she said about -- did she 6 start doing these unauthorized withdrawals 7 herself? 8 Did James tell her to do it? 9 Do you remember what she said 10 about that? 11 A I don't exactly remember what 12 said. But what I could recollect from the 13 interview was that she was approached not 14 only by James Ryu but also by Mr. Hong -- 15 Hur -- Hong Sik Hur to lend him some money 16 or to facilitate some money to James Ryu. 17 And that's why we started asking all these 18 other questions, you know, was Mr. Hong 19 asking directly, or was it Mr. Ryu giving 20 you instructions on how to do it. And 21 later on, she said that she came out with 22 the method, but then she provided the cash 23 to Mr. James Ryu. 24 Q Okay. What you were talking	Page 65
1	about with Mr. Hur, was that, like, an 2 employee loan? Was that what she was 3 talking about? 4 A Yes. I believe from my 5 recollection is that the loan was 6 mentioned by Irene Lee. I know that Mr. 7 Hur had asked Irene Lee to take a personal 8 loan and -- under her name -- under 9 Irene's name and lend the money to Mr. 10 Ryu, and she refused to do that. You know, 11 she said she had to think about it. She 12 would discuss it with her husband, and she 13 thought that wasn't right. And then after 14 that, she refused it. 15 And I don't know whether she told 16 directly or Mr. James Ryu found out about 17 it, but from my recollection was that 18 Mr. Ryu was saying that he was kind of 19 embarrassed that Mr. Hong would ask her to 20 do such a thing. 21 That he had asked for a personal 22 loan to Mr. Hur himself directly and not to 23 do certain transactions such as that and, 24 you know, have Irene involved in such a	Page 66
1	situation. 2 Q And all this was discussed at 3 this January 23rd meeting? 4 A Yes. 5 Q And was Irene telling you this 6 story or Karen, about the employee loan 7 and Irene saying no and James being 8 embarrassed? 9 Was that Irene telling that 10 part of the story, or was it Irene and 11 Karen? 12 A Yes, that was Irene. 13 And I think -- yeah, Karen was 14 aware of it. I think that was my 15 impression. 16 Q And so that whole story about 17 what Irene was telling you, what did that 18 have to do with Karen's embezzlement, do 19 you know? 20 MR. YI: Objection to form. 21 THE WITNESS: Well, my 22 understanding was that there were -- I 23 don't recall the exact flow of the 24 conversation, the interview was. But	Page 67
1	there were some mentioning why everyone at 2 BankAsiana knew that James was in a 3 financial difficulty, and that he was going 4 around borrowing money from everyone else 5 that he knew. So I think Irene also 6 mentioned that because Karen would mention 7 that he was in a financial debt and that he 8 needed the money and she wanted to help by 9 giving the cash. 10 BY MR. DZARA: 11 Q Karen wanted to help James with 12 his financial difficulties, that's why she 13 gave him the cash that she was embezzling? 14 A Yes. Because James had asked her 15 if there was a way anyone -- if she knew a 16 way she could facilitate some cash for him 17 so maybe, you know -- that she could 18 figure out a way to do it. So that's when 19 she decided to withdraw cash. 20 Q And was Karen already doing, 21 like, the embezzling process when James 22 approached her, or did she start -- she 23 figured out how to do it after James 24 approached her?	Page 68

	Page 69	Page 71
1	MR. YI: Objection to form.	1 A I don't have the exact years, the
2	THE WITNESS: I didn't get -- I	2 time frame. But I think it kind of
3	didn't get that full information. I	3 correlated to -- it kind of matched to the
4	wouldn't know to say whether she started	4 report Bo Young had provided.
5	the embezzlement first and then give the	5 Q So the time frame she told you --
6	money to James, or did she start the	6 she did give you a time frame during this
7	embezzlement after James asked. That, I	7 meeting?
8	couldn't -- I wouldn't be able to tell you	8 A I don't recall. But maybe one of
9	that for sure.	9 my memos, I would have mentioned some of
10	BY MR. DZARA:	10 that. I don't know.
11	Q Okay. Did she say she gave all	11 Q Okay. We'll get to that. I'm
12	the money she embezzled to James, she	12 just trying to get your understanding of
13	didn't keep any of it herself?	13 what you remember about that meeting
14	A Well, during the interview, we	14 before I show you the documents.
15	could tell that she did use some of the	15 Did you -- what was your impression of
16	funds for her own use, the cash. That she	16 Karen during meeting?
17	had to put some -- deposit some of the cash	17 A What do you mean by my impression
18	into the business account that her husband	18 of Karen? Could you be more specific?
19	owned.	19 Q Well, did you -- did you find her
20	Q So she said that, or you guys	20 believable, what she was saying?
21	figured -- like, she told you that during	21 A Yeah, I would find her generally
22	the interview?	22 credible, believable because, I mean, she
23	A Yes, she told us that.	23 confessed to her crimes, and she was
24	Q Do you remember how much she said	24 very -- she was very concerned about her
	Page 70	Page 72
1	she -- the total amount she stole?	1 husband, her kids, and also, you know, she
2	A She -- I remember her saying it	2 was very remorseful about what she did.
3	was approximately about a million or	3 And then she wanted to be able to help to
4	something, but --	4 resolve this case as soon as possible.
5	Q Did she say how much she kept?	5 Q So she said she wanted to help
6	A She didn't give us an exact	6 resolve it.
7	figure, how much. She was going to maybe,	7 Did she say how she wanted to
8	like, 20 -- 255 or 300. She didn't say	8 help resolve it?
9	exactly. She couldn't recall at that time	9 A Well, she didn't say how she
10	how much she got for herself.	10 wanted to help us to get all this, and I
11	Q So she gave you a ballpark figure	11 don't know -- from the interview, I think
12	of what she thought she kept? She guessed	12 she mentioned that if -- when she
13	about -- she gave a guess about how much	13 approached James, you know, about the
14	she thought she kept? Is that what you	14 money that they needed to make up the cash
15	remember?	15 withdrawals from the customers' accounts,
16	A Yeah. I believe she kind of	16 that he was very -- like, he was denying
17	guessed a very low amount compared to the	17 it.
18	total amount, yes.	18 And then she thought maybe she
19	Q And did she say the rest she gave	19 was the one who should have been covering
20	to James?	20 the funds. But at that time, it wasn't
21	A Yes.	21 something that she could handle.
22	Q Did she say -- did she give you	22 Q What did she say she did with the
23	the years of how long -- when she was	23 money that she kept?
24	doing this, the time frame?	24 A The only thing that I recall was

	Page 73	Page 75
1	that she was depositing to her husband's 2 business account. 3 Q Okay. So she said she wanted to 4 help, and the way she was going to help 5 was to tell you everything she did and 6 help you guys figure out who the affected 7 customers were? 8 A Yes. 9 MR. YI: Objection to form. 10 THE WITNESS: Yes. 11 BY MR. DZARA: 12 Q So that was her help? Her help 13 was not paying the money back that she 14 stole? 15 A We did mention if -- I mean, if 16 she was willing -- I mean, if she had a 17 way of paying it back. But she mentioned 18 that she could pay back, but she couldn't 19 pay back the whole amount because she 20 wasn't -- she didn't have that kind of 21 money. I think that's what I recall. It 22 could be, you know, a little bit different 23 wording, but that's what she said. 24 Q Did she -- do you know if she	1 received, yes. 2 Q Okay. So you were just taking 3 Karen for her word when she said James was 4 involved, and you believed that he was 5 involved? 6 A Well, with the information that 7 we had, I had no reason why not. 8 Q Well, somebody who just admitted 9 she committed a crime and confessed and 10 is now saying that somebody else was 11 involved -- and you had not met with James, 12 had you? 13 A No. I had not met with James, no. 14 Q So you believed someone who 15 committed a crime, you were believing her 16 word? 17 MR. YI: Objection to form. 18 THE WITNESS: Well, like I said, 19 she confessed to the crime, and she was 20 very credible at the time, and she was 21 mentioning that the reason why she did it 22 was because someone had asked her to do 23 it, and that's James Ryu. 24 BY MR. DZARA:
1	paid any of the money back to the bank? 2 A I have no knowledge of that. 3 Q Okay. Was part of your job in 4 interviewing Karen at this meeting to 5 figure out if there was anybody else 6 involved? 7 A Yes. 8 Q That was part of your job? 9 A Anybody -- anybody else involved, 10 that was why I asked those questions if 11 there were anyone else involved, yes, with 12 Karen. 13 MR. YI: David, sorry to 14 interrupt. Just can we take a break when 15 you get a chance? 16 MR. DZARA: Yes. Let me get a 17 couple more questions, and then we'll take 18 a break. I promise. 19 MR. YI: Yeah. 20 BY MR. DZARA: 21 Q Okay. When you left that 22 meeting, did you believe that James had 23 been involved with the embezzlement? 24 A With the information that I	1 Q So you found her credible at the 2 time, yes? 3 A Yes. 4 Q Did you ever, at a later point in 5 time, rethink her credibility? 6 A No. 7 Q Nothing you learned later on made 8 you think she wasn't lying? 9 A Oh, I -- I don't know what you're 10 talking about, what I learned. What I 11 learned was everything on the report, on 12 the interview, and whatever investigation 13 results that I had received. That's all I 14 have. 15 Q Okay. Did you learn anything 16 about that interview of Karen to rethink 17 that she was telling the truth about 18 James's involvement? 19 A No. I did not get the question. 20 I'm sorry. Could you repeat that? 21 MR. DZARA: Isabel, can you read 22 it back? 23 (Record read.) 24 THE WITNESS: No.

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	<p>1 BY MR. DZARA:</p> <p>2 Q Did you learn anything after the 3 interview to rethink that she was telling 4 the truth about James being involved?</p> <p>5 MR. YI: Objection. Asked and 6 answered.</p> <p>7 THE WITNESS: I did get some 8 information in regards to Mr. Ryu's 9 involvement in the New Millennium Bank 10 setup or purchase or something. So maybe 11 I had my suspicions. Maybe he were using 12 the funds for that. I don't know. That's 13 what I thought.</p> <p>14 BY MR. DZARA:</p> <p>15 Q Okay. Have you told me 16 everything that you remember about the 17 January 23rd interview of Karen?</p> <p>18 A I believe that I've told you 19 everything that I remember at this time 20 from that meeting.</p> <p>21 Q Okay.</p> <p>22 A Yes.</p> <p>23 Q How did the meeting end?</p> <p>24 A The meeting ended because I was</p>	<p>1 A No, I didn't take any notes. I 2 just recorded it.</p> <p>3 Q Okay. And was the meeting in 4 Korean or in English?</p> <p>5 A It was in Korean.</p> <p>6 MR. DZARA: Okay. Michael, 7 let's take a break.</p> <p>8 MR. YI: All right. Thanks. 9 (Record read.)</p> <p>10 BY MR. DZARA:</p> <p>11 Q Tell me what you did after the 12 January 23rd meeting. What did you do?</p> <p>13 That day after you left the 14 meeting, did you call anybody?</p> <p>15 A I have no recollection of calling 16 anybody. If I did -- I might have, but I 17 don't know exactly who I called. It was 18 three and a half years ago.</p> <p>19 MR. DZARA: Okay. Can you -- 20 Michael, can you show the next exhibit?</p> <p>21 It's not marked. It is an e-mail 22 from Ms. Lee to Ms. Jeon dated January 23 23rd, 2014. There's nothing on the e-mail, 24 just forwarding a memo or attaching a memo.</p>
	<p>1 getting a lot of calls that I needed to 2 attend, and I told her -- well, I think it 3 was kind of late, and I told her, 4 "Whatever you remember, if you remember 5 anything else that you need to tell us," 6 you know, "you can contact me on my cell 7 phone" or she could contact Irene Lee. And 8 that's how we ended the meeting.</p> <p>9 Q Did you give her your contact 10 information?</p> <p>11 A Yeah, I did give her my personal 12 cell phone number. I didn't bring my 13 business card, so I think I jot it down on 14 somebody's or a napkin or something. I 15 gave it to her.</p> <p>16 Q Was the meeting in the morning or 17 in the afternoon?</p> <p>18 Do you remember?</p> <p>19 A Well, I think I met -- it was in 20 the afternoon, past noon.</p> <p>21 Q Okay.</p> <p>22 A Yes.</p> <p>23 Q And last question is about this. 24 Did you take notes during the meeting?</p>	<p>1 Page 78</p> <p>1 MR. YI: Got it.</p> <p>2 MR. DZARA: Okay. This one needs 3 to be marked. I think we're up to Ryu 37. 4 (Exhibit 37 was marked for 5 identification and is attached hereto.)</p> <p>6 BY MR. DZARA:</p> <p>7 Q Okay. Ms. Lee, take a look at 8 that, and let me know once you've reviewed 9 it.</p> <p>10 A Yeah, I recognize this. It's a 11 memo that I sent to Ms. Elaine Jeon after 12 the meeting.</p> <p>13 Q Okay. Let me step back for one 14 second.</p> <p>15 You said you didn't take any 16 notes. Do you know if Irene or Bo Young 17 took any notes of the interview of Karen 18 on the 23rd?</p> <p>19 A I don't have no recollection of 20 that, whether they took a note or not.</p> <p>21 Q Okay. Let's look at this exhibit 22 Ryu 37. It's Bates-numbered WB 1579, and 23 it's an e-mail from you to Ms. Jeon on 24 January 23rd, 2014, at 9:28 p.m.</p>

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	<p>1 So this -- the second page is the 2 attachment. It's a memorandum from you to 3 Elaine Yeon. The subject is "BA 4 unauthorized CD withdrawal incident." 5 Is this the memo you drafted the 6 same day after your interview with 7 Ms. Jeon?</p> <p>8 A Yes, it appears to be. 9 Q Do you remember drafting this? 10 A Yes. 11 Q When you drafted it, did you 12 draft it from your memory, or did you 13 listen to the recording? 14 A I drafted it from my memory. 15 Q And do you remember -- this may 16 be a tough question to remember, but did 17 you draft this right away, right after the 18 meeting, or was there some time in-between? 19 A There was some time in-between. 20 Q Okay. So did you get a chance to 21 read the memo? 22 A Yes. 23 Q Okay. My question is: Is 24 everything in here, you believe, true or</p>	<p>1 draft -- 2 A Yes, uh-huh. 3 Q -- the report? 4 A Yes. 5 Q Okay. Did you ever talk to Orest 6 about your interview of Karen on January 7 23rd? 8 A I may have discussed it with him, 9 yes. 10 Q But to your recollection, you 11 never drafted any other document about 12 that January 23rd meeting other than this 13 memorandum; is that right? 14 A I have no recollection of 15 drafting any other thing. 16 Q Okay. Sticking with the second 17 paragraph, as you just said, it starts 18 with "The details of the interview will be 19 submitted separately, but to summarize 20 today's interview, Karen Chon confessed 21 that the unauthorized transactions were 22 her wrongdoing and that the funds were 23 delivered to James Ryu." 24 Do you see that?</p>
	<p>1 at least what Karen told you during the 2 meeting? 3 A Yes. 4 Q Okay. So the second paragraph, 5 it states, the first sentence, "The 6 details of the interview will be submitted 7 separately." 8 Do you see that? 9 A Yes. 10 Q Did you ever draft any other 11 summary of your January 23rd meeting with 12 Karen other than this memo? 13 A No, I didn't. 14 Q So what did you mean by "the 15 details of the interview will be submitted 16 separately"? Do you remember what you 17 meant by that? 18 A Well, I was going to submit 19 details of the interview and the 20 investigations separately, but I learned 21 after that that our internal auditor, Orest 22 Hamersky, was coming, so I left the 23 reporting to be his. 24 Q So you left it up to him to</p>	<p>1 Page 82 2 A Yes. 3 Q So does that mean that she said 4 she transferred all the funds that she 5 took -- she stole to James? 6 A I mean, are you asking me whether 7 I meant to say that? 8 Q Yeah. Because there's no mention 9 here, I don't think, of how much she kept 10 or how much she gave to him. I know you 11 testified before you remember her kind of 12 giving a guess about how much she took and 13 said the rest she gave to James? 14 A Right. 15 Q That's not in this memo. 16 A Yeah, that's not in this memo. 17 Q Okay. 18 A But my intention was to 19 communicate that there were funds -- cash 20 delivered to James Ryu. I didn't mean to 21 say that all -- that she delivered 22 everything to James Ryu. 23 Q Okay. It doesn't say "all," but 24 it seems -- in my reading, it seems to imply that it was all. But you didn't</p>

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<p>1 intend to say all was given to James; is 2 that correct?</p> <p>3 A That's correct.</p> <p>4 Q Midway down, there's a sentence. 5 "As per Karen's statement, Mr. Ryu 6 mentioned to her that he would compensate 7 her for her help."</p> <p>8 Do you see that?</p> <p>9 A Yes.</p> <p>10 Q What do you remember about what 11 Karen told you about that sentence?</p> <p>12 A Well, she mentioned that because 13 of -- in the beginning, she did start 14 giving him some cash whenever he needed 15 it. And when they were meeting for lunch 16 and all of that, you know, he would always 17 say that, "I know" -- that, "I will 18 compensate you for your help" in 19 facilitating that cash to him.</p> <p>20 Q Did she say what she thought 21 "compensate" meant?</p> <p>22 A No.</p> <p>23 Q Did Karen say anything that -- I 24 know we might have covered this a little</p>	<p>1 Q Okay. Let's discuss what you 2 just said.</p> <p>3 You recollect Karen saying at the 4 meeting that James helped or gave her ideas 5 on how to do the embezzlement; right?</p> <p>6 A Yes.</p> <p>7 Q And later you learned that no, it 8 was all Karen's doing. She came up with 9 everything; right?</p> <p>10 MR. YI: Objection to form.</p> <p>11 THE WITNESS: I had the idea that 12 James had given the idea to come up with 13 the process, and that wasn't in Karen's 14 exact words, that she -- she didn't say 15 that. I heard that from Bo Young saying 16 that, "Well, you're saying that yesterday 17 when you were talking that James give you 18 the instruction on how to do it." And 19 then she retracted saying that no, that it 20 was her who came up with the idea.</p> <p>21 BY MR. DZARA:</p> <p>22 Q Okay. So during the January 23rd 23 meeting, Bo Young said to Karen, "Oh, you 24 told us yesterday at the January 22nd</p>
<p>1 bit before, but I just want to clarify 2 your testimony.</p> <p>3 Did Karen say that James helped 4 her to come up with the scheme of how to 5 do the embezzling, or was it all Karen's 6 idea?</p> <p>7 MR. YI: Objection to form.</p> <p>8 Asked and answered.</p> <p>9 Go ahead.</p> <p>10 THE WITNESS: I don't have an 11 exact recollection, but I believe at first 12 she had said that James had helped. And 13 then after that, she did mention that was 14 her coming up for the -- in how to make all 15 these transactions go and get the funds 16 out of the customers' account.</p> <p>17 BY MR. DZARA:</p> <p>18 Q So you said "James helped." What 19 do you mean by "James helped"?</p> <p>20 A Well, James giving her idea on 21 how to do it. But later on, we learned 22 that it wasn't James who give her 23 instruction on how to do it. She's the 24 one who come up with her own method.</p>	<p>1 Page 86</p> <p>2 meeting that James," you know, "helped you 3 come up with the idea." And then Karen 4 responded, "No. No. No. It was all my 5 idea"?</p> <p>6 A Yeah, uh-huh.</p> <p>7 MR. YI: Objection to form.</p> <p>8 THE WITNESS: Yes, that was my 9 understanding.</p> <p>10 BY MR. DZARA:</p> <p>11 Q Okay. All right. So at the time 12 you sent this memo, what was the status of 13 the investigation?</p> <p>14 A The status was still ongoing. It 15 wasn't closed. I mean, we had to find out 16 the exact amount, the clients that were 17 involved who needed to replenish their 18 cash too, and if we had to correct any of 19 the 1099 reporting, all that. That was 20 something I needed to find out.</p> <p>21 Q Okay. So what did you -- what 22 did you do? After you sent this memo, what 23 did you do?</p> <p>24 A Well, after I sent this memo, I went to bed.</p>

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1	Q Okay. All right. That's understandable.	1 during that time? What specifically were 2 you doing? What was your role? What were 3 you asked to do?
4	A The next day, I went to the 5 branch, and I went with -- to help Irene 6 and Bo Young and research, try to find out 7 any documentation that could support any 8 of the saying, that could assist in the 9 investigation and help compile the reports for the internal auditor.	4 A Well, my role was to support 5 all these transactions, find out the 6 supporting documentation, trying to 7 find evidence that Karen had withdrawn 8 those funds, and that -- make the 9 determination -- the exact amount of the 10 loss that the bank would have incurred 11 because of this incident.
12	Q Do you remember -- after you sent 13 this memo to Elaine Yeon, did you have 14 anymore communications with her around 15 that time about what you were doing, what 16 your thoughts were, what your 17 investigation results were?	12 Q So your primary role was to 13 figure out how much money she actually 14 took and who were the affected customers?
18	A I might have, but I have no recollection and what type of communication I had with her.	15 A Yes. 16 Q Did you have any other -- did you 17 have any other responsibilities in this 18 investigation other than that?
19	Q Okay. Who was -- was there 20 someone in charge of the investigation -- 21 somebody overseeing the whole thing at 22 Wilshire Bank?	19 A No. 20 Q Okay. Were you asked to help 21 out -- to find out -- research if James was 22 involved or any connection to James?
23	A Oh, I believe on the operational 24 side was my boss Elaine Yeon and also Mr.	23 A No. 24 Q Were you asked to look at any of
	Page 90	Page 92
1	Dom Tallerico, our chief internal auditor, 2 would be in charge because the internal 3 auditor was also involved in the 4 investigation.	1 James's bank accounts to see if he had any 2 deposits that the bank considered 3 suspicious? 4 A Well, I took the job onto my 5 myself. I had no instruction from them. 6 But because his name was mentioned in the 7 investigation, I did look into his account 8 and to see if there were any suspicious 9 transactions that could help in evidence 10 or that could support the statement made 11 by Karen.
5	Q Okay. Was Lisa Pai involved in the investigation?	12 Q And what did you -- what were the 13 results of that part of your investigation?
6	A I believe Lisa Pai was informed about the incident, and she might have been involved in the investigation, but I have no knowledge of how much or was she in charge. I don't know.	14 A During the investigation, I kind of find it odd that he would receive some payment from a law office -- some checks that were from a law office that was deposited into his account. And it was not only him, but also Mr. Hur that got payment from a law office in regards to -- I think it was involved with New Millennium Bank.
7	Q Who -- what was your -- now we're post January 23rd. Now we're onto January 24.	15 Q Okay. Other than those transactions and those deposits that you
8	A Yes.	
9	Q How long were you in New Jersey? How long did you stay there?	
10	A I don't have the exact recollection, but I stayed -- was it 24? I think I stayed over -- past the weekend, so I don't know the exact day. Maybe I could have stayed for over five, six, seven days. I don't know.	
11	Q Okay. And what were you doing	

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<p>1 just mentioned, did you -- did you think 2 those transactions had something to do 3 with the embezzlement?</p> <p>4 A What -- I couldn't make that 5 determination myself. I was just 6 investigating and trying to find out any 7 evidence that could show that -- support 8 Karen's statement.</p> <p>9 Q Okay. Did you find -- what 10 else -- did you find any other 11 transactions in James's account that you 12 found suspicious in addition to the ones 13 that you just mentioned?</p> <p>14 A No. I haven't find anything at 15 that time, no.</p> <p>16 Q Okay. Did you find -- did you -- 17 did you find any evidence looking at 18 James's transactions in his bank accounts 19 that supported Karen's statement that he 20 was involved in the embezzlement?</p> <p>21 MR. YI: Objection to form.</p> <p>22 THE WITNESS: I did not find -- 23 I couldn't determine whether those were 24 something that could support. But I did</p>	<p>1 transactions were, those deposits from the 2 law office and New Millennium Bank?</p> <p>3 MR. YI: Objection to form.</p> <p>4 THE WITNESS: I believe someone 5 mentioned that that was because he was 6 trying to join -- I mean, as the 7 management team to the New Millennium 8 Bank, and he was getting investors and 9 being paid for it. That's all I have.</p> <p>10 BY MR. DZARA:</p> <p>11 Q Okay. Who did you learn that 12 from?</p> <p>13 A I have no recollection who told 14 me that. I'm sorry.</p> <p>15 Q You don't have to apologize. 16 Don't apologize for not remembering. 17 That's perfectly appropriate.</p> <p>18 Do you remember when you learned 19 that information about James's role with 20 New Millennium Bank?</p> <p>21 MR. YI: Objection to form.</p> <p>22 THE WITNESS: I don't have 23 recollection. It was probably after I 24 left New Jersey.</p>
Page 94	Page 96
<p>1 find it kind of unusual that he would get 2 that kind of payment from the law office.</p> <p>3 BY MR. DZARA:</p> <p>4 Q Okay. You found it odd, but was 5 that -- did you or anybody else later 6 decide that those payments were evidence 7 that he was involved in the embezzlement?</p> <p>8 A No.</p> <p>9 Q "No," you never concluded that?</p> <p>10 A I never concluded that.</p> <p>11 Q Okay. So you took it upon 12 yourself to look at James's transaction 13 history to look for any evidence to 14 support Karen's statement that he was 15 involved?</p> <p>16 A Right.</p> <p>17 Q Did you find any evidence to 18 support her statement?</p> <p>19 MR. YI: Objection to form.</p> <p>20 Asked and answered.</p> <p>21 THE WITNESS: No.</p> <p>22 BY MR. DZARA:</p> <p>23 Q No? Okay.</p> <p>24 Did you later find out what those</p>	<p>1 BY MR. DZARA:</p> <p>2 Q Okay. Was it close in time to 3 this investigation, like -- we're in 4 January of 2014. Was it close in time to 5 January 2014, couple of weeks after, a 6 month? Do you remember?</p> <p>7 A I don't remember.</p> <p>8 Q Okay. Okay. So to your 9 knowledge, you didn't discover any 10 evidence from James's bank accounts 11 corroborating Karen's statement that he 12 was involved; right?</p> <p>13 A Correct.</p> <p>14 MR. YI: Objection to form.</p> <p>15 THE WITNESS: Yes.</p> <p>16 BY MR. DZARA:</p> <p>17 Q Thank you. Who were you reporting 18 to during this investigation while you were 19 in New Jersey?</p> <p>20 I'm talking about the time you're 21 still in New Jersey. Who were you reporting 22 to about what you were doing?</p> <p>23 A I was reporting to Elaine Jeon.</p> <p>24 Q Okay. And you said Orest came to</p>

	Page 97	Page 99
1	New Jersey too?	1 Q And Bo Young was back at the
2	A Yes, he came to New Jersey, I	2 Palisades Park headquarters?
3	think, the week after.	3 A Yes.
4	Q Were you still there?	4 Q Was there anybody else assisting
5	A Yes.	5 you guys while you were there during the
6	Q Okay. And what was Orest -- what	6 investigation -- any other Wilshire Bank
7	was his role in the investigation?	7 employees in New Jersey, not in L.A.?
8	A His role in the investigation --	8 A In New Jersey, I did ask the IT
9	as an internal auditor, he would have to	9 personnel if they had any of the old
10	determine the loss and provide a report.	10 computers that were used by either
11	Q So when he showed up, were you,	11 Irene -- I'm sorry -- by Karen or James
12	like, assisting him? Were you assisting	12 Ryu, if there were anything left that we
13	his investigation?	13 could take for the forensic.
14	A Yes. I would provide all the	14 Q Was that -- was his name Eunmoo
15	printouts of the reports and screenshots	15 Choi?
16	so that Mr. Hamersky could compile his	16 A Yes. I believe that's his name,
17	report.	17 yeah.
18	Q And were you, like -- were you	18 Q Do you know if they were able to
19	giving your opinion about things, like, "I	19 locate the computers or whatever happened
20	think it's this account. I think it's that	20 to the computers?
21	account"?	21 A I was told that some of the
22	Were you actually helping him	22 computers that Mr. James Ryu was working
23	make the decisions to figure out what	23 on were taken by him. There were two
24	happened or were you just giving him the	24 computers that were taken by him, and one
	Page 98	Page 100
1	source documents?	1 was a personal desktop computer and one
2	A Well, I was giving him mainly the	2 was a laptop.
3	source documents, and he wanted to figure	3 Q And who did you learn that from?
4	out what type of transaction it was. I	4 A I believe I learned it from Mr.
5	would explain that type of transaction to	5 Choi, Eunmoo Choi. He said that those
6	him.	6 computers are no longer there.
7	Q Okay. Who else was assisting you	7 Q And do you remember anything else
8	and Orest in New Jersey in the	8 about the computers?
9	investigation?	9 A No, I don't.
10	A Mainly Irene Lee.	10 Q Were you talking to anybody else?
11	Q And was Bo Young helping too?	11 Other than Ms. Jeon, were you talking to
12	A Bo Young was at the corporate	12 anybody else at Wilshire Bank headquarters
13	office, and I was investigating at the	13 about the investigation and what you were
14	East Fort Lee branch where the actual	14 doing?
15	transactions and embezzlement had occurred.	15 A What do you mean, "anybody else
16	Q Okay. So when you were in New	16 during" --
17	Jersey, you were spending all of your time	17 Q Well, you were reporting to Ms.
18	at the Fort Lee branch?	18 Jeon?
19	A Yes.	19 A Yes.
20	Q And Orest, when he showed up, he	20 Q Were you talking to Dom Tallerico
21	was at that branch with you?	21 or anybody -- Lisa Pai or anybody else at
22	A Yes.	22 Wilshire Bank about the investigation, or
23	Q And Irene Lee was there too?	23 were you just giving Ms. Jeon updates?
24	A Yes.	24 A I was giving mostly the updates

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<p>1 to Ms. Jeon, and I might have talked to 2 Lisa Pai for some questions, but I don't 3 remember what I discussed with her.</p> <p>4 Q Did Lisa Pai ever interview you 5 about the investigation -- your role in 6 the investigation?</p> <p>7 A No, she didn't.</p> <p>8 Q If you were -- you remember being 9 interviewed by the FBI; correct?</p> <p>10 A Yes.</p> <p>11 Q Were you ever interviewed by 12 anyone else about your role in the 13 investigation and what you discovered 14 during the investigation?</p> <p>15 A No, I wasn't.</p> <p>16 Q Did you draft any documents or 17 any reports about your role and what you 18 were doing and what you were finding in 19 the investigation?</p> <p>20 A No.</p> <p>21 Q Why -- you said you were in the 22 Fort Lee branch. You were there about a 23 week, approximately?</p> <p>24 A I don't remember the exact dates,</p>	<p>1 in terms of investigating what happened, 2 who was involved, anything else on those 3 subjects?</p> <p>4 A No.</p> <p>5 Q Do you know if the investigation 6 was still ongoing after you were done? Do 7 you know if there was still an 8 investigation being done by Wilshire Bank 9 about the embezzlement?</p> <p>10 A I don't have an exact 11 recollection whether they were continuing 12 to. But again, I'm imagining that there 13 were still some investigate done.</p> <p>14 Q Okay. But you don't know for 15 sure?</p> <p>16 A No.</p> <p>17 Q And your -- the results of your 18 part of the investigation -- so you said 19 you gave everything you found to Orest to 20 support which accounts were affected, 21 which customers, and how much money it was 22 that was taken; is that right?</p> <p>23 A Yes. Correct.</p> <p>24 Q And do you remember the</p>
<p>1 but it was several days, yes.</p> <p>2 Q Okay. What -- why did you -- 3 what was the decision for you to go back 4 to L.A.?</p> <p>5 Why did you fly back?</p> <p>6 A Because -- my decision to fly 7 back to L.A. -- first of all, I had to go 8 back to my baby, and second was that I 9 gathered sufficient evidence to back up the 10 statement from Karen saying that certain 11 funds that were withdrawn from the 12 accounts were matching. Yes, uh-huh.</p> <p>13 Q So when you went back to L.A., 14 was your role done in the investigation? 15 Did you do anything else?</p> <p>16 A In the investigation, yeah, my 17 role was pretty much done on the 18 investigation. I had to go and do some 19 corrections to the 1099 reportings because 20 they were a mess. So that was my next 21 step -- my next job.</p> <p>22 Q Okay. But other than correcting 23 stuff on the back end like the restitution 24 stuff and 1099s, did you do anything else</p>	<p>1 overall -- the amount that was -- Wilshire 2 Bank concluded was taken by Karen?</p> <p>3 A I don't have that recollection, 4 the exact amount, but it was approximately 5 over a million.</p> <p>6 Q Okay. Did you see any 7 investigation or audit reports 8 summarizing -- you said you -- let me 9 strike that.</p> <p>10 You said you knew Orest was 11 working on a report; right?</p> <p>12 A Yes.</p> <p>13 Q Did you ever see the report Orest 14 drafted?</p> <p>15 A I did not see any report that 16 Orest drafted. There was a communication 17 from Orest -- from Orest asking -- 18 actually, mentioning that the original 19 amount that we came out to be may not be 20 correct, that he wanted to take a look 21 again.</p> <p>22 Q Okay. But you don't remember 23 seeing like an actual report written --</p> <p>24 A No.</p>

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1	Q -- documenting everything that 2 was done? 3 A No. 4 MR. DZARA: Okay. Can you -- the 5 next exhibit, hopefully, at the top of the 6 stack, Michael, should be an e-mail from 7 Bo Young to Elaine Yeon dated January 8 24th, 2014, at 4:11 p.m. It's not marked. 9 I think we're going to mark this one 10 number Ryu 38, please. 11 (Exhibit 38 was marked for 12 identification and is attached hereto.) 13 BY MR. DZARA: 14 Q Okay. Ms. Lee, would you take a 15 look at this document and let me know when 16 you're ready. Really, just look at the 17 first page. I think all the other pages 18 are repeats of what we looked at before. 19 A Yes. 20 Q So this is e-mail from Bo Young 21 to Elaine Yeon and copying you and Irene 22 Lee dated January 24, 2014. It's 23 Bates-numbered WB 1580. 24 So I know we covered some of the	1 24th. It's not marked. All right. This one 2 needs to be marked as Ryu 39, please. 3 (Exhibit 39 was marked for 4 identification and is attached hereto.) 5 THE WITNESS: Yes. Ready. 6 BY MR. DZARA: 7 Q Okay. Have you seen this 8 document before? 9 A Yes. It appears to be an e-mail 10 that Orest sent to me on Friday letting me 11 know that he'll be flying in Sunday. 12 Q Okay. Do you remember receiving 13 this e-mail? 14 A Yes. 15 Q Okay. Did you -- do you remember 16 reviewing it as part of your deposition 17 preparation? 18 A Yes. 19 Q Okay. So in his second 20 paragraph, third sentence, he says, "My 21 role is to help you in any way you 22 determine necessary and to determine the 23 amount of the loss." 24 Do you see that?
1	investigation. These are just some e-mails 2 during the time, I believe, you were in 3 Fort Lee doing the investigation. And this 4 is an e-mail from Bo Young to Elaine about 5 possibly wanting to see the accounts that 6 were affected. 7 Does that look right to you? 8 A Yes. 9 Q Okay. And Bo Young was directly 10 communicating with Ms. Jeon. 11 Do you know, like, while you were 12 doing your investigation you were there -- I 13 mean, you were talking to Ms. Jeon, but do 14 you know, were Bo Young and Irene talking to 15 Ms. Jeon too? 16 A Well, according to the e-mail, 17 yes, they were talking. 18 Q Okay. But you don't remember 19 that? 20 A No, I don't remember that. 21 MR. DZARA: Okay. All right. 22 You can set that aside. 23 Next one, hopefully, Michael, is an 24 e-mail from Orest to Alicia dated January	Page 106 1 A Yes, uh-huh. 2 Q So he -- I know -- I'm not trying 3 to pick a fight or anything with you, but 4 it looks like he's saying here he's 5 supporting you, but you remember that 6 you're really supporting him? 7 A Right. 8 Q So once he got there, did it turn 9 out that he took the lead, and you were 10 supporting him? 11 A Yes. 12 Q Okay. And it mentions Anthony 13 Chung in the second-to-last paragraph. 14 Do you know who Anthony Chung is? 15 A Yes. He is our, at that time, IT 16 manager. 17 Q Okay. And then the last 18 sentence, he mentions Dom. 19 Is that Dom Tallerico? 20 A Yes. That's his boss. That's 21 the chief internal auditor. 22 Q Okay. Other than -- who was in 23 the audit department? 24 Was there a lot of employees

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<p>1 other than Dom and Orest?</p> <p>2 A Yes.</p> <p>3 Q And Orest was just one of the</p> <p>4 audit managers? Were there more than one</p> <p>5 audit managers?</p> <p>6 A Yes.</p> <p>7 Q Okay. Had you worked with Orest</p> <p>8 before in any way prior to this</p> <p>9 investigation?</p> <p>10 A Worked with him?</p> <p>11 Q Yeah.</p> <p>12 A I was audited by Orest.</p> <p>13 Q You were audited by Orest?</p> <p>14 A Yes. Because Orest does auditing</p> <p>15 of all the departments in our bank, so.</p> <p>16 MR. DZARA: Got it. Okay. You</p> <p>17 can set that aside.</p> <p>18 Next one, Michael, should be,</p> <p>19 hopefully, an e-mail from Alicia to Elaine</p> <p>20 Yeon dated Saturday, January 25th, and the</p> <p>21 subject is New Millennium Bank.</p> <p>22 MR. YI: David, just one thing</p> <p>23 for the record. I notice that in one of</p> <p>24 the exhibits that we recently looked at,</p>	<p>1 testified before you thought were, you</p> <p>2 know, kind of suspicious?</p> <p>3 A Yes.</p> <p>4 Q Okay. And you later found out,</p> <p>5 though, that James was doing work with New</p> <p>6 Millennium Bank, and these were payment</p> <p>7 for his work?</p> <p>8 MR. YI: Objection to form.</p> <p>9 THE WITNESS: Yes.</p> <p>10 BY MR. DZARA:</p> <p>11 Q And one question. How did you</p> <p>12 discover these checks? Did you have</p> <p>13 access to his Wilshire Bank account?</p> <p>14 A Yes.</p> <p>15 Q All right. So you were able to</p> <p>16 see all deposits, transactions? You were</p> <p>17 able to see everything in the account?</p> <p>18 A Yes.</p> <p>19 MR. DZARA: Next one, Michael,</p> <p>20 should be, hopefully, an e-mail from</p> <p>21 Alicia to Irene Lee dated Saturday,</p> <p>22 January 25th. It's going to be Ryu 41.</p> <p>23 (Exhibit 41 was marked for</p> <p>24 identification and is attached hereto.)</p>
<p>1 names of City account holders were --</p> <p>2 appeared. There were two names that</p> <p>3 appeared. I'm going to have to go back</p> <p>4 and figure out whether we need to redact</p> <p>5 those or not. And if we determine it may</p> <p>6 be necessary to redact those names, I'll</p> <p>7 confer with you.</p> <p>8 MR. DZARA: Okay.</p> <p>9 (Exhibit 40 was marked for</p> <p>10 identification and is attached hereto.)</p> <p>11 BY MR. DZARA:</p> <p>12 Q All right. The document that,</p> <p>13 Ms. Lee, you have in front of you, we're</p> <p>14 going to mark it Ryu 40.</p> <p>15 A Yes.</p> <p>16 Q And it's Bates-numbered WB 1584.</p> <p>17 It is an e-mail from you to Ms. Jeon dated</p> <p>18 January 25th, 2014. I believe you already</p> <p>19 testified about this before, but these are</p> <p>20 the New Millennium Bank-related checks that</p> <p>21 you discovered that were paid or deposited</p> <p>22 into James's account; is that right?</p> <p>23 A Correct.</p> <p>24 Q Okay. And these are the ones you</p>	<p>1 Page 110</p> <p>2 BY MR. DZARA:</p> <p>3 Q All right. There's an attachment</p> <p>4 with this e-mail, but I didn't provide it</p> <p>5 because it was a long Excel spreadsheet.</p> <p>6 This is Bates-numbered WB 1585. It's an</p> <p>7 e-mail from you to Irene Lee dated January</p> <p>8 25th, and I believe the transaction -- the</p> <p>9 Excel spreadsheet, if I remember</p> <p>10 correctly, was a copy of all certificate</p> <p>11 of deposit transactions since 2009 from</p> <p>12 BankAsiana.</p> <p>13 My question is not if you agree</p> <p>14 with me or not. My question is what was --</p> <p>15 I know you kind of testified before about</p> <p>16 Irene's role.</p> <p>17 What was Irene's role during the</p> <p>18 time -- at the Fort Lee branch during the</p> <p>19 investigation?</p> <p>20 A Because she -- we acquired</p> <p>21 BankAsiana, and BankAsiana was under a</p> <p>22 totally different system than Wilshire</p> <p>23 Bank at the time. And she was a better</p> <p>24 expert in accessing that system to</p> <p>retrieve all the data. I needed her help.</p>

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1	<p>Q Okay. Do you remember that Irene Lee left shortly after this embezzlement came to light?</p> <p>A Yes, I do remember.</p> <p>Q Okay. What do you remember about the circumstances of her departure from Wilshire Bank?</p> <p>A Well, she had found a new position at a different bank and that she was leaving us. That's all I remember.</p> <p>Q Okay. You don't remember anything about the stress of this investigation was a reason for her leaving?</p> <p>A She didn't mention that to us.</p> <p>MR. DZARA: Okay. All right. Next one is an e-mail not marked -- an e-mail from Ms. Lee to Alex Ko and some other people dated January 27, 2014, one page.</p> <p>MR. YI: Okay. Just give me one second, please. Okay. David, can you repeat what you just said?</p> <p>MR. DZARA: Sure. It's an e-mail</p>	<p>document before?</p> <p>A Yes.</p> <p>Q Okay. Did you review it as part of your deposition preparation?</p> <p>A Yes.</p> <p>Q Okay. Do you remember it other than reviewing it during your deposition preparation? Do you remember it independently of that?</p> <p>A Yes.</p> <p>Q Okay. So this is Bates-numbered WB 1586. The first e-mail or the e-mail at the bottom of the page, bottom half, is from Alex Ko who was CFO of Wilshire Bank at that time, on January 27, 2014, to Elaine Yeon, you, and Bo Young.</p> <p>And he's asking for the balance of James and Karen's account -- the current balance of their accounts with Wilshire Bank; is that right?</p> <p>A Correct.</p> <p>Q And the next e-mail on top of the page, you respond, and you provide the balance of the two accounts; correct?</p>
1	<p>to Alex Ko and a couple other people dated January 27, 2014. It's one page, two e-mails.</p> <p>MR. YI: WB 1594?</p> <p>MR. DZARA: 1586.</p> <p>MR. YI: Oh.</p> <p>MR. DZARA: You know, Michael, let's go off the record. I've got, like, seven in a row here. Let's go off the record and get them in order, and that will save some time, I think.</p> <p>MR. YI: Yeah.</p> <p>MR. DZARA: Okay. Off the record, Isabel.</p> <p>(RECESS)</p> <p>(Exhibit 42 was marked for identification and is attached hereto.)</p> <p>BY MR. DZARA:</p> <p>Q The next exhibit we're on, hopefully, in front of you, Ms. Lee, is Ryu 42. Take a look at it, and let me know when you're done.</p> <p>A Yes, I'm ready.</p> <p>Q Okay. Have you ever seen this</p>	<p>Page 114</p> <p>A Yes.</p> <p>Q Okay. Do you know why Mr. Ko was asking for this information at that time?</p> <p>A No, I don't.</p> <p>Q Do you know why you responded instead of Elaine or Bo Young?</p> <p>A Elaine asked me to.</p> <p>Q Oh, so you remember that?</p> <p>A Yes.</p> <p>Q But you don't know why he was asking for this information, then?</p> <p>A No.</p> <p>Q Okay. Next one should be the e-mail from Alex Ko on January 30, 2014. We're going to mark it Ryu 43. And take a look at it, and let me know when you're done, Ms. Lee. You don't need to read the whole article or the attachment.</p> <p>A Okay.</p> <p>(Exhibit 43 was marked for identification and is attached hereto.)</p> <p>BY MR. DZARA:</p> <p>Q All right. So this is a document we marked Ryu 43. It's Bates-numbered WB</p>

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<p>1 1576. It's an e-mail from Alex Ko to a 2 bunch of people, including you, on 3 January 30, 2014. And he's attaching an 4 article -- a news article from SNL that 5 concerns New Millennium Bank. 6 And he says -- Mr. Ko says in 7 this e-mail, "I highlighted in yellow 8 related to Hur, Mr. Ryu, and Injin Choi 9 involvements in New Millennium Bank." 10 Do you see that? 11 A Yes. 12 Q Okay. Do you remember receiving 13 this e-mail? 14 A Yes. 15 Q Okay. Do you know who Injin Choi 16 is? 17 A No, I don't know. 18 Q Okay. So you testified before 19 that you later learned -- well, you 20 testified when we saw the checks -- the 21 check from a law firm regarding New 22 Millennium Bank to James, you've already 23 testified about that, and you looked at 24 them; right?</p>	<p>1 doing work for New Millennium Bank? 2 A No, I don't remember because 3 of -- 4 Q Okay. You can complete your 5 answer. I didn't mean to cut you off. 6 A The checks did mention -- on the 7 check, it did say New Millennium Banking 8 in acronyms, NMB or something. So maybe 9 that's when I learned that he was doing 10 something. But this could have been, you 11 know -- could have completed my -- what is 12 it? Suspicious or knowledge that Mr. Ryu 13 was working for the New Millennium Bank. 14 Q Okay. Do you know why Alex Ko 15 was sharing this article with all these 16 people in this e-mail? 17 A Oh, I don't know why. But the 18 people in the e-mail seems to be our CEO, 19 our board of directors, and persons that 20 were involved in the investigation. 21 Q Okay. So higher-up, 22 executive-level people -- 23 A Yes. 24 Q -- employees of Wilshire Bank?</p>
<p>1 A Yes. 2 Q And then you testified that you 3 later found out that James was doing work 4 for New Millennium, and that it was your 5 understanding that those checks were 6 payment for his work; right? 7 A Correct. 8 Q Okay. So this article here is 9 talking about New Millennium Bank and 10 James's involvement. 11 Is this when you learned about 12 James's work with New Millennium Bank? 13 A I don't recall whether this was 14 the time I learned or it was before. I 15 have no recollection, the timing. 16 Q Okay. Let me just say, the 17 e-mail that you had sending the checks, 18 the copies of the New Millennium Bank 19 checks, was Ryu 40, and it's -- that e- 20 mail was dated January 25th. Now, this is 21 just five days later. 22 So you don't remember if this, 23 you know, five days later is when you were 24 told or learned that James was actually</p>	<p>1 A Yes. 2 Q Do you know, was Wilshire Bank 3 concerned about New Millennium Bank for 4 any reason at this time? 5 A I wouldn't know what to say. I 6 have no knowledge of that to... 7 Q Okay. So you think you -- I know 8 this may -- I don't want you to guess, but 9 do you think you received that e-mail 10 because you were involved in the 11 investigation at that time? 12 A Yes, I believe that's the reason 13 why I got this e-mail. 14 Q Okay. You can put this aside. 15 Move on to the next one. It 16 should be an e-mail from you to Orest 17 dated January 31st. We're going to mark 18 it Ryu 44. Take a look at it, and let me 19 know when you're done. 20 A Yes, I'm ready. 21 (Exhibit 44 was marked for 22 identification and is attached hereto.) 23 BY MR. DZARA: 24 Q Okay. So this e-mail is marked</p>

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1	Ryu 44. It's Bates-numbered WB 1589, and 2 it is an e-mail from you to Orest dated 3 January 31st, 2014. And you are -- looks 4 like you're forwarding the previous e-mail 5 we looked at that had the law firm checks 6 to Mr. Ryu that he had deposited in his 7 Wilshire Bank account associated with his 8 work for New Millennium Bank; is that 9 right?	1 Q Okay. I guess I never asked you 2 the question before why you thought they 3 were suspicious based on what they said. 4 What about them was suspicious? 5 A At that time, I wasn't aware that 6 trust accounts were able to pay for the 7 payrolls. I didn't know whether it was a 8 legitimate transaction from the trust 9 account. That's what I thought. 10 Q Okay. So the suspicion was you 11 didn't know a trust account could make 12 payments like this? 13 A Yes, payroll payments. 14 Q Okay. But we're looking at this 15 check, it says "salary." I guess you may 16 not believe that the check was for salary. 17 Obviously, I'm not asking you that. 18 A Yes. 19 Q But your testimony is what gave 20 you suspicion about these checks was the 21 fact that it was being paid out of a trust 22 account; right? 23 A Yes. 24 Q Okay. Thank you.
1	Q One thing is, looking at the 2 checks, flip the page to the attachment. 3 Do you see the two checks right in the 4 middle of the first page, on the memo 5 line, it says "Salary expenses NMB"? 6 A Yes. 7 Q Do you see that? Okay. 8 So you testified before when you 9 saw these checks, you found these 10 suspicious? 11 A Yes. 12 Q And I guess -- did you testify 13 before that you didn't know what NMB meant? 14 A No. I knew that NMB meant New 15 Millennium Bank. 16 Q Okay. So despite -- so these 17 checks, you're saying -- in the memo line 18 "Salary expenses for New Millennium Bank," 19 and they were being paid, you know, by a 20 trust account from a law firm. 21 A Right. 22 Q And you said you thought these 23 were suspicious at the time? 24 A Yes. Yes.	1 Next one should be an e-mail from 2 you to Elaine Yeon February 11, 2014, at 3 4:09 p.m. We're going to mark it Ryu 45. 4 Okay. Take a look at it, and let me know 5 when you're ready. 6 A Yes, ready. 7 (Exhibit 45 was marked for 8 identification and is attached hereto.) 9 BY MR. DZARA: 10 Q Okay. So this is a document 11 marked Ryu 45, and it is Bates-numbered WB 12 1590. It's an e-mail from you to Elaine 13 Jeon dated February 11, 2014. And it 14 attaches -- you say in your e-mail "Please 15 review memo and let me know if you need 16 anything else to be addressed." And the 17 attached memo is a -- appears to be a 18 restitution memo for Alex Ko to review and 19 sign; right? 20 A Correct. 21 Q Okay. Looking at the memo -- 22 well, first of all, tell me, why did you 23 draft this memo? 24 A Why did I draft this memo? Well,

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<p>1 I needed to restitute the funds that were 2 embezzled by Karen Chon to the accounts 3 because the accounts were coming due to 4 maturity, and we needed to restitute that. 5 Q Okay. Why was approval needed by 6 Alex Ko?</p> <p>7 A Because he was our CFO, and we 8 needed to debit it from our suspense G/L.</p> <p>9 Q Okay. Does he always have to 10 approve these types of restitution 11 payments, or is it when they're above a 12 certain amount?</p> <p>13 A It's -- above certain amount, yes.</p> <p>14 Q Okay. Do you remember what the 15 certain amount was? What the threshold was?</p> <p>16 A I don't remember.</p> <p>17 Q Did Elaine Jeon tell you to draft 18 this, or did you do this on your own 19 because you knew you had to do it?</p> <p>20 A No. Elaine Yeon told me to draft 21 it.</p> <p>22 Q Okay. So if you read this memo, 23 it says that Karen embezzled the money; 24 right?</p>	<p>1 involved?" Did anybody tell you that? 2 A No, no one did.</p> <p>3 Q Okay. Did you discuss -- we're 4 around this time in this investigation, 5 late January or early February 2014. Did 6 you discuss with anybody at Wilshire Bank 7 your belief at that time that you thought 8 James was involved?</p> <p>9 A I might have, but I don't recall 10 discussing it with anyone at this time.</p> <p>11 Q Okay. Did anybody ask your 12 opinion, around this time, if you thought 13 James was involved?</p> <p>14 A No, no one asked for my opinion.</p> <p>15 Q And do you remember offering your 16 opinion to anybody at Wilshire Bank, at 17 this time, about your opinion that he was 18 involved?</p> <p>19 A I don't recall offering my 20 opinion at any time during this time, no.</p> <p>21 Q Okay. So at this time, you only 22 link between -- that you knew of, the only 23 link between James and Karen and the 24 embezzlement was Karen's statement; right?</p>
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<p>1 A Yes.</p> <p>2 Q Okay. There's no mention of 3 James --</p> <p>4 A Yes.</p> <p>5 Q -- in this memo; correct?</p> <p>6 A Yes.</p> <p>7 Q There's no mention of him?</p> <p>8 A No mention of James in this memo.</p> <p>9 Q Okay. At this time, did you 10 think -- so this time of February 11, 11 2014 -- did you believe that James was 12 involved in the embezzlement?</p> <p>13 A Yes.</p> <p>14 Q Okay. So if you believed he was 15 involved in the embezzlement, why isn't he 16 mentioned in this?</p> <p>17 A I didn't have any evidence at the 18 time, just Karen's statement.</p> <p>19 Q Okay. So is that the reason why 20 you didn't mention it, because you didn't 21 have any other evidence?</p> <p>22 A Yes.</p> <p>23 Q Did anybody say "Hey," you know, 24 "you should put James in here. Wasn't he</p>	<p>1 A Correct.</p> <p>2 Q Okay. You can set that aside. 3 So the next one should be Alicia 4 to Elaine February 11, 2014, 5:21 p.m. 5 We're going to mark this one Ryu 46, 6 please. Okay. Take a look at it, 7 Ms. Lee, and let me know when you're ready.</p> <p>8 A Ready.</p> <p>9 (Exhibit 46 was marked for 10 identification and is attached hereto.)</p> <p>11 BY MR. DZARA:</p> <p>12 Q Okay. This document has been 13 marked Ryu 46, and it's Bates-numbered 14 WB1591. And it is an e-mail from you to 15 Elaine Jeon dated February 11, 2014, at 16 5:21 p.m., and it looks like -- it looks 17 like you're sending a revised -- although 18 it doesn't say in the cover e-mail, I 19 think you send a revised restitution memo.</p> <p>20 And if you look at the last 21 exhibit compared to this one, I think the 22 only change you made is in the second 23 paragraph, you added in from March 2010 to 24 October 2014. You just added in the time</p>

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1	period of when you think Karen was 2 embezzling? 3 A Yes. 4 Q Okay. And it looks like the last 5 sentence -- or the third paragraph, you 6 added in the last five words saying "by 7 debiting the suspense liability G/L." 8 A Yes. 9 Q Do you remember why you made 10 these revisions? Did anybody ask you to do 11 it? 12 A Yes. 13 Q Who did? 14 A It was Elaine. 15 Q Okay. I think there's one more 16 addition. The last sentence in the second 17 paragraph, I believe, was added in too. 18 And again, this memo makes no 19 mention of James in it; right? 20 A No. 21 Q Okay. All right. 22 Next one should be -- we're going 23 to mark it Ryu 47. 24 MR. YI: You're doing okay?	1 think somebody else explained that in a 2 prior deposition, that that's what -- kind 3 of what these acronyms are. 4 Okay. And again, this memo 5 doesn't mention James as well? 6 A No. 7 Q Do you know if anybody at 8 Wilshire Bank, at this time -- I know you 9 said -- you testified that you thought 10 James was involved based solely on Karen's 11 statement and no other evidence. But did 12 anybody else at Wilshire Bank think James 13 was involved, do you know? 14 MR. YI: Objection to form. 15 Go ahead. 16 THE WITNESS: I wouldn't have an 17 answer for that. 18 (Exhibit 48 was marked for 19 identification and is attached hereto.) 20 BY MR. DZARA: 21 Q Okay. Okay. Next one we're 22 going to mark Ryu 48. It is an e-mail 23 from you to Alex Ko. 24 A Yes.
1	THE WITNESS: Yeah. (Exhibit 47 was marked for 3 identification and is attached hereto.) 4 BY MR. DZARA: 5 Q Okay. Ready? 6 A Yes. 7 Q All right. So Ryu 47, Bates- 8 numbered WB 1594, it's an e-mail from you 9 to Alex Ko dated February 11, 2014, 9:39 10 p.m. and it looks like you're sending him a 11 copy of the restitution memo that we just 12 looked at in the prior exhibit. 13 Is that your understanding? 14 A Yes. 15 Q Okay. You have "Dear JMN." What 16 does JMN stand for? 17 A It's an honorific name for our 18 executive vice president of the company, 19 and it's Jeon Mu Nim. 20 Q Okay. Is it, like, a Korean 21 acronym? 22 A Yes. 23 Q Okay. I saw a lot of e-mails 24 that had that. I just wanted to know. I	Page 130 1 Q All right. So it's an e-mail to 2 Alex Ko. It's Bates-numbered WB 1592, and 3 it's dated Wednesday, February 12, 2014, 4 and it looks like it's a restitution memo 5 again, and there was a typo that was fixed. 6 A Right. 7 Q October 2014 was changed to 8 October 2013; is that right? 9 A Correct. 10 Q Okay. Who is -- you're copying 11 Alvin Ha. 12 Who is Alvin Ha? 13 A Alvin Ha is the controller of 14 Wilshire Bank. 15 Q Okay. Now, I never saw a signed 16 copy. Well, going back to this memo, 17 attached to this e-mail -- again, James is 18 not mentioned in this e-mail; correct? 19 A He's not. 20 Q Okay. I never saw a signed copy, 21 but I assume that Mr. Ko ended up signing 22 this? 23 A Yes. 24 Q And it's your understanding that

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<p>1 all of the affected customers had their 2 money put back in their accounts? 3 A Yes. 4 Q Okay. You can set that aside. 5 Let's go to the next one. It'll 6 be Ryu 49 -- or we're going to mark it Ryu 7 49. 8 A Ready. 9 (Exhibit 49 was marked for 10 identification and is attached hereto.) BY MR. DZARA: 12 Q Okay. This document that's been 13 marked as Ryu 49 is Bates-numbered WB 14 1595. It is an e-mail from Orest to you 15 dated February 18, 2014. And in the e-mail 16 Orest is -- well, tell me if you remember 17 seeing this e-mail. 18 A Yes, I remember seeing this 19 e-mail. 20 Q Okay. So tell me -- rather than 21 me tell you what it is, you tell me, what 22 is this? Tell me what you're talking 23 about in this e-mail with Orest. 24 A Well, Orest was trying to</p>	<p>1 saying he took out these five? 2 A Right. 3 Q Okay. So now, this is February 4 18th. You're, you know, I guess you've 5 been back -- you're back in L.A. at this 6 time. 7 So you testified before that 8 you thought your work was pretty much done 9 on this investigation when you got back to 10 L.A. This appears to be a few weeks after 11 that. Is there still some, you know, 12 little things going on? 13 Does that help you remember 14 that? 15 A Yes. He wanted -- 16 Q So you remember? 17 A Yes. He wanted to confirm 18 certain transactions with me. Although my 19 investigation was done when I came back 20 Los Angeles, there were some 21 communications between Orest and myself in 22 regards to getting the all these 23 transactions clarified. 24 Q Okay. Was he asking you to sign</p>
<p>1 communicate to me saying that maybe the 2 amount we first came out to be the total 3 amount of loss was incorrect, so he was 4 trying to discuss this with me. 5 Q Okay. So the second paragraph, 6 it's one sentence. It says "I took the 7 following out of your spreadsheet." 8 Do you see that? 9 A Yes. 10 Q Do you remember drafting -- what 11 spreadsheet is he referring to? 12 A It's the memo that I attached 13 to -- not the memo. There was a 14 spreadsheet that I presented to one of the 15 memos. I don't know if it was addressed 16 to Elaine Jeon or not, which was later 17 forwarded to Orest. But I think that's 18 what he's talking about. 19 Q So the spreadsheet you drafted 20 was what you thought the total loss was, 21 or the transactions that added up to the 22 total loss? 23 A Yes. 24 Q Okay. So he reviewed it. He's</p>	<p>1 off on this or agree on this, or was he 2 providing this to you like an FYI? 3 A It's like an FY -- I can't even 4 say it. 5 MR. DZARA: Okay. You can set 6 this aside. 7 MR. YI: If you need to take a 8 break, just let us know if you're getting 9 tired. BY MR. DZARA: 11 Q Yeah, if you want to take a 12 break, let me know. Let's go on. There's 13 only two -- do you need a break? 14 A No. Go ahead. I'm okay. Let's 15 just get through this. 16 Q Okay. So there's just two more 17 e-mails in this line of questioning. Can 18 you get the next one? E-mail from Lisa 19 Pai to Elaine Jeon and you and a couple 20 others dated February 26. We're going to 21 mark it Ryu 50. 22 A Yes. 23 (Exhibit 50 was marked for 24 identification and is attached hereto.)</p>

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1	BY MR. DZARA: 2 Q Okay. Take a look at it, and let 3 me know when you're ready. 4 A Ready. 5 Q Okay. So this document has been 6 marked Ryu 50, and it's Bates-numbered WB 7 11930. 8 Do you recognize this document? 9 A Yes, I do. 10 Q Okay. Do you remember seeing it? 11 A Yes, I remember seeing it. 12 Q At your deposition prep or when 13 it was sent? 14 A When it was sent. 15 Q Okay. So this is an e-mail from 16 Lisa to you and Elaine Jeon and Alex Ko 17 and Thomas, last name is Ng. Who is Thomas? 18 A Thomas Ng is our chief risk officer. 19 Q Okay. And it's copying Orest and 20 Dom Tallerico and somebody from Crowe 21 Horwath. 22 Do you know Crowe Horwath? 23 A I believe this is one of our	1 Q Okay. She's mentioning 2 interviews with Karen. 3 Other than your interview with 4 Karen, do you know of any other 5 interviews with Karen by anyone at 6 Wilshire Bank? 7 A No, I don't. 8 Q It's mentioning litigation 9 discovery or depositions. 10 Were you aware of any litigation at that time concerning the embezzlement? 11 A No, I wasn't. 12 Q Okay. You're aware of this case right now -- right? -- the case between 13 Wilshire Bank and -- well, really, Bank of 14 Hope and Karen Chon and Mr. Ryu? 15 A Yes, I am. 16 Q Okay. What do you know about this case? 17 A This case? I think this is a civil case, and you are attorney for Mr. 18 James Ryu. That's all I know. 19 Q Okay. Do you know any of the claims that Wilshire Bank has against Mr.
1	accounting auditors that we contract. 2 Q That Wilshire Bank contracted with? 3 A Yes. 4 Q Okay. So Lisa is telling everybody, as an FYI, that this is an updated loss summary and the detailed backup spreadsheet from Orest that's confirming a total loss amount of \$1,575,754.10; right? 5 A Correct. 6 Q All right. So this is a determination of what the amount was that Karen embezzled; correct? 7 A Yes. 8 Q And she says in her second paragraph "While this amount could still change in the future after more detailed interviews with Karen or litigation discovery or depositions, the bank has concluded our internal investigation of the loss amount with this report." 9 Do you see that? 10 A Yes.	24 Page 138 1 Ryu? 2 A No, I don't. 3 Q Do you know any of the claims 4 that Mr. Ryu has against Bank of Hope? 5 A No, I don't. 6 Q Okay. Do you know when this 7 litigation was started? 8 A No, I don't. 9 Q Were you involved, at all, in 10 deciding to initiate this litigation 11 against Mr. Ryu or Ms. Chon? 12 A No, I wasn't. 13 MR. YI: David, with respect to 14 this exhibit document, Ryu 50, I'm going 15 to have go back and determine whether this 16 should have been produced or should have 17 been put on the privileged log. If we 18 decide it should have been on our log, it 19 should not have been produced, then I will 20 confer with you. 21 MR. DZARA: Okay. 22 BY MR. DZARA: 23 Q Ms. Lee, do you -- are you aware of the criminal charges brought against

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	<p>1 Karen?</p> <p>2 A Yes. I was informed of that.</p> <p>3 Q Okay. What do you know about</p> <p>4 them?</p> <p>5 A What do you mean, that the</p> <p>6 criminal --</p> <p>7 Q What do you know about Karen's</p> <p>8 criminal situation regarding this</p> <p>9 embezzlement?</p> <p>10 MR. YI: Objection to form.</p> <p>11 THE WITNESS: Well, I know that</p> <p>12 Karen had her criminal case done first,</p> <p>13 and I think it's over. And that's pretty</p> <p>14 much what I know about that.</p> <p>15 BY MR. DZARA:</p> <p>16 Q Do you know anything about -- do</p> <p>17 you know where Karen is right now?</p> <p>18 A I believe she is in federal</p> <p>19 prison.</p> <p>20 Q Okay. So are you aware that she</p> <p>21 pled guilty to certain criminal charges?</p> <p>22 A I would assume since she's in</p> <p>23 federal prison.</p> <p>24 Q Okay. Do you know if any</p>	<p>1 e-mail from Bo Young to Alicia, April 29,</p> <p>2 2014 -- dated. We're going to mark this</p> <p>3 one Ryu 51.</p> <p>4 Can you just take a look at the</p> <p>5 first e-mail? You don't need to look at</p> <p>6 all the attachments.</p> <p>7 A Yes.</p> <p>8 (Exhibit 51 was marked for</p> <p>9 identification and is attached hereto.)</p> <p>10 BY MR. DZARA:</p> <p>11 Q And let me know when you're ready.</p> <p>12 A Okay. Ready.</p> <p>13 Q Okay. So this document is marked</p> <p>14 Ryu 51. It is Bates-numbered WB 1596, and</p> <p>15 it's a one-page e-mail string between you</p> <p>16 and Bo Young. So the initial e-mail in</p> <p>17 this string is from you to Bo Young on</p> <p>18 April 28, 2014.</p> <p>19 And what do you -- just tell me</p> <p>20 what you're asking from Bo Young in this</p> <p>21 e-mail.</p> <p>22 A I'm asking her to provide the</p> <p>23 offset items for all these transactions</p> <p>24 that occurred in 2011. Since I had no</p>
	<p>1 criminal charges were brought against</p> <p>2 James for the embezzlement?</p> <p>3 A I don't know. I'm not aware.</p> <p>4 Q You're not aware one way or the</p> <p>5 other?</p> <p>6 A No.</p> <p>7 Q So here -- and looking back at</p> <p>8 Ryu 50, the last sentence says "The bank</p> <p>9 has concluded our internal investigation</p> <p>10 of the loss amount with this report";</p> <p>11 right?</p> <p>12 A Yes.</p> <p>13 Q Was the bank investigating</p> <p>14 anything else?</p> <p>15 Are you aware if the bank was</p> <p>16 investigating anything else at this time</p> <p>17 time other than the lawsuit regarding the</p> <p>18 embezzlement?</p> <p>19 A I wasn't aware of it.</p> <p>20 Q Okay. You weren't involved in</p> <p>21 any other aspects of the investigation?</p> <p>22 A No, I wasn't.</p> <p>23 Q Okay. You can set that aside.</p> <p>24 All right. The next one is an</p>	<p>1 access to the old BankAsiana computer</p> <p>2 system, she was providing me that.</p> <p>3 Q Does that have anything to do</p> <p>4 with the embezzlement investigation, or is</p> <p>5 this concerning something else?</p> <p>6 A Oh, I believe this was because</p> <p>7 they wanted to confirm the discrepancy on</p> <p>8 the amount that I first provided, the</p> <p>9 1.68-something and the final amount.</p> <p>10 Q Okay. So did this concern the</p> <p>11 embezzlement investigation?</p> <p>12 A Yes.</p> <p>13 Q So looking back at the last e-</p> <p>14 mail from Lisa, it's dated February 26th,</p> <p>15 and it's saying that, you know, the bank</p> <p>16 concluded its internal investigation with</p> <p>17 the loss amount with this report. Now,</p> <p>18 this is over two months later, and it</p> <p>19 looks like you're still asking questions</p> <p>20 or trying to get more confirmation from Bo</p> <p>21 Young about certain of the transactions</p> <p>22 that were at issue in the embezzlement.</p> <p>23 So was the investigation still</p> <p>24 ongoing about the loss amount into April</p>

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	<p>1 2014?</p> <p>2 A No. I think that was because</p> <p>3 there was an amount set aside on the</p> <p>4 liability G/L, and our controller wanted</p> <p>5 me to clear some of the discrepancy</p> <p>6 because the amount did not match. That's</p> <p>7 why, that's all I know.</p> <p>8 Q That's all you recall?</p> <p>9 A Yeah.</p> <p>10 Q So do you remember who -- did</p> <p>11 somebody ask you to send this e-mail to Bo</p> <p>12 Young?</p> <p>13 A Oh, no. I did it on my own to</p> <p>14 find out -- to determine the exact amount</p> <p>15 of the loss because at that time, I wasn't</p> <p>16 quite sure whether I should confirm on the</p> <p>17 1.5 or 1.6. That's why.</p> <p>18 Q And do you believe you received</p> <p>19 the information you asked for from Bo Young?</p> <p>20 A Well, yes. This is the</p> <p>21 information that I asked from Bo Young.</p> <p>22 Q Do you remember resolving the</p> <p>23 discrepancy on the G/L liability side that</p> <p>24 you just testified about?</p>	<p>1 Jersey.</p> <p>2 Q In Fort Lee?</p> <p>3 A Yes.</p> <p>4 Q And it was -- was it during the</p> <p>5 time while you were at Fort Lee during</p> <p>6 that week of your investigation?</p> <p>7 A Yes, I believe so.</p> <p>8 Q And how did you -- how did the</p> <p>9 interview get set up?</p> <p>10 Do you remember?</p> <p>11 A I don't remember exactly. I</p> <p>12 believe either Lisa Pai had contacted the</p> <p>13 FBI to meet with me -- but they were there</p> <p>14 when we met at the hotel lobby.</p> <p>15 Q Was anybody with you?</p> <p>16 A Orest Hamersky was with me.</p> <p>17 Q Okay. Did they interview Orest</p> <p>18 while they interviewed you, or was it just</p> <p>19 you?</p> <p>20 A They interviewed both of us.</p> <p>21 Q They interviewed both of you?</p> <p>22 A Yes.</p> <p>23 Q Do you remember what you told the</p> <p>24 FBI?</p>
	<p>1 A I remember telling that my belief</p> <p>2 was that 1.6 was correct to Orest.</p> <p>3 Q That your number was correct, not</p> <p>4 the number that Orest came up with?</p> <p>5 A Uh-huh.</p> <p>6 MR. YI: David, if I may? I'm</p> <p>7 just going to remind the witness to try to</p> <p>8 say "yes" and not "uh-huh" because that</p> <p>9 may not reflect accurately.</p> <p>10 THE WITNESS: Right.</p> <p>11 MR. YI: Sorry. Go ahead.</p> <p>12 MR. DZARA: Thank you, Michael.</p> <p>13 BY MR. DZARA:</p> <p>14 Q So there was the discrepancy.</p> <p>15 Do you remember if that</p> <p>16 discrepancy was ever resolved?</p> <p>17 A I have no knowledge of that.</p> <p>18 Q Okay. So you say you remember</p> <p>19 being interviewed by the FBI; correct?</p> <p>20 A Yes.</p> <p>21 Q And do you know where the</p> <p>22 interview took place?</p> <p>23 A I believe it took place in the</p> <p>24 lobby of the hotel that I was at in New</p>	<p>1 Page 146</p> <p>2 A Yes.</p> <p>3 Q Okay. What did you tell them?</p> <p>4 What do you remember telling them?</p> <p>5 A Oh, okay. That was a question?</p> <p>6 Q That was the question.</p> <p>7 A Well, I remember telling about</p> <p>8 the Karen interview, and that we were</p> <p>9 suspecting a large amount of cash being</p> <p>10 embezzled by Karen, and also that there may</p> <p>11 have been someone else involved in the case.</p> <p>12 Q Okay. Did you tell them who the</p> <p>13 other one was that you thought was</p> <p>14 involved in the case?</p> <p>15 A I don't recall if I mentioned</p> <p>16 their name or not.</p> <p>17 MR. DZARA: Okay. Michael, can</p> <p>18 you pull out -- the FBI memo should be</p> <p>19 there of her interview. Should be marked</p> <p>20 Ryu 21 already.</p> <p>21 MR. YI: It's actually, I</p> <p>22 believe -- yeah, Ryu 21. Correct.</p> <p>23 BY MR. DZARA:</p> <p>24 Q Okay. Ms. Lee, I want you to</p> <p>read this, not skim it, read it. Well,</p>

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	<p>1 first of all, have you ever seen this 2 before?</p> <p>3 A No, I haven't.</p> <p>4 Q Okay. Oh, this -- okay. Correct 5 me. You testified before that the FBI 6 memo was read to you by Mr. Yi but you 7 never saw it?</p> <p>8 MR. YI: Objection to form.</p> <p>9 THE WITNESS: I never saw it.</p> <p>10 BY MR. DZARA:</p> <p>11 Q You never saw it, but you were -- 12 correct -- was that your testimony before, 13 that you said Mr. Yi read this to you?</p> <p>14 A Could you repeat the question 15 again?</p> <p>16 Q I think I asked you before about 17 this FBI memo a couple of hours ago. And 18 you said you didn't see it, but it was 19 read to you by Mr. Yi; is that correct?</p> <p>20 A What I meant was I did not read 21 it myself. It was read to me.</p> <p>22 Q Yeah, I understand.</p> <p>23 MR. YI: Just to clarify. I'll 24 represent that I did read it to her.</p>	<p>1 And it's a weird Bates numbering, so I'm 2 not going to put it on the record. But it 3 was produced by Karen Chon.</p> <p>4 The -- it looks like at the 5 bottom of the page, it says "Investigation 6 on January 28, 2014."</p> <p>7 Does that sound like the date 8 you were interviewed?</p> <p>9 A Yes, it sounds like about the 10 date that I was interviewed.</p> <p>11 Q Okay. And it says it took 12 place -- the first paragraph says it took 13 place at the Doubletree Hotel in Fort Lee; 14 correct?</p> <p>15 A Correct.</p> <p>16 Q It states that Orest was with you 17 during the interview?</p> <p>18 A Yes.</p> <p>19 Q Okay. So the next paragraph -- 20 anything incorrect in the next paragraph 21 that starts with "BankAsiana is a Fort 22 Lee, New Jersey-based bank"?</p> <p>23 A No.</p> <p>24 Q Okay. Do you remember telling the</p>
	<p>1 MR. DZARA: All right. Why did 2 you let me ask the question three times, 3 Michael? Come on. All right.</p> <p>4 Well, now I want you to read 5 this. And my question is going -- I want 6 you to spend five minutes or however long 7 it takes you to read this.</p> <p>8 And my question is going to be if 9 anything in here is, you believe, not 10 correct. But take your time. And I'm 11 going to ask you some specific questions 12 about it too.</p> <p>13 Okay. And while you do that, I'm 14 going to run out and use the bathroom, so 15 we can go off the record while she's 16 reading that, okay?</p> <p>17 MR. YI: Okay.</p> <p>18 (RECESS)</p> <p>19 BY MR. DZARA:</p> <p>20 Q First paragraph -- well, for the 21 record, this is an exhibit, Ryu 21. It 22 was marked at -- during Lisa Pai's 23 deposition. The Bates numbers on here are 24 from, I believe, Karen Chon's attorney.</p>	<p>1 Page 150</p> <p>1 investigators that?</p> <p>2 A Yes.</p> <p>3 Q Next paragraph, anything 4 incorrect in that paragraph?</p> <p>5 A No.</p> <p>6 Q Okay. Do you remember telling 7 them this?</p> <p>8 A Yes.</p> <p>9 Q Next paragraph, it says -- well, 10 anything incorrect with that paragraph?</p> <p>11 A Well, at that time, we were 12 Wilshire Bank, not Wilshire State Bank. So 13 if you're talking about this -- and also 14 the first paragraph has the banks wrong.</p> <p>15 Q Okay. I'm more concerned about, 16 like, you know, you seeing something and 17 saying "I definitely did not say that." 18 That's what I'm concerned about.</p> <p>19 We can go paragraph by 20 paragraph, but for you to say -- I want you 21 to testify if you remember saying that and 22 if there's anything incorrect, like, you 23 know, big corrections, not, you know, 24 Wilshire Bank -- Wilshire's name is wrong.</p>

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1	MR. YI: Objection to the form. 2 BY MR. DZARA: 3 Q So we're looking at that 4 paragraph. Is there anything incorrect 5 with that paragraph? 6 A No. 7 Q All right. It does say here -- 8 it qualifies you and Orest as internal 9 auditors. Did you consider 10 yourself an internal auditor? 11 A That would be a wrong statement. 12 I'm not an auditor. 13 Q Okay. Next paragraph that begins 14 with "Lee and Hamersky found," anything 15 incorrect in that paragraph? 16 A I believe not, no. 17 Q Okay. And you remember saying 18 this to them? 19 A Yes. 20 Q All right. On top of page 2, the 21 first paragraph, anything incorrect in 22 that paragraph? 23 A No. 24 Q No?	A All right. Q Okay. So you're saying this first paragraph of page 2 is correct, and you think it's both you and Orest that said this to the FBI agents; right? A Yes. MR. YI: Objection to form. THE WITNESS: Yes. BY MR. DZARA: Q Okay. Next paragraph. MR. YI: David, can we just clarify one thing for the record? Are you asking whether these were her actual statements or a summary of the discussions at the interview? MR. DZARA: Well, I mean, the basis of my -- the questions are is this what she said? Is this what she remembers saying? Is it correct? Correct as in not is it true factually, but, is it what she remembers saying? Like, is this a correct summary of what she told the FBI agents. That's what I want to know. MR. YI: Okay.
1	A No. Q And you remember saying this? MR. YI: Objection to form. THE WITNESS: I don't know whether I said it or if Mr. Hamersky said it, but I believe we did discuss this in the interview. BY MR. DZARA: Q Okay. So either you or Orest said this in the first paragraph? A Yes. MR. YI: Objection to form. BY MR. DZARA: Q Okay. I'm going to represent that there is no interview memo for Orest. The only interview memo of this meeting was this. So nowhere in here does it say that Orest said any of this. But I'm just telling you I'm representing that, and Mr. Yi can object or disagree. That's fine. But this -- if you read these paragraphs and you say it was a combination of you and Orest, let me know, okay?	Page 154 MR. DZARA: I'm not asking if these are true, you know, because personally, I believe some of these statements are not true. We're not discussing that. We're not debating that. This isn't the place for it. But I want to know if this an accurate summary of what she told the FBI agents if she remembers. She may not remember. That's fine. But that's what I want to know, if that makes sense. MR. YI: Yeah, it's just a clarification as to a summary of the information she provided during the interview versus what she literally told them. MR. DZARA: Yeah, no. It's a summary of what -- if this an accurate -- in her memory of what she recalls, is this an accurate summary of what she told the FBI agents. MR. YI: Okay. Thanks. BY MR. DZARA: Q Do you understand that, Ms. Lee?

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1	A Yes. I believe what I said was 2 October 1st, not November 4, 2013, which 3 was Karen Chon's last day of employment at 4 the bank. 5 Q So October 1st, 2013? 6 A Yes. 7 Q Okay. And that's the first 8 paragraph of page 2; right? 9 A Correct. 10 Q Okay. All right. How about the 11 second paragraph on page 2, is this an 12 accurate summary of what you told the FBI 13 agents? 14 A Yes. 15 Q Okay. Who did you -- now, this 16 second paragraph concerns the meeting 17 with -- the meeting between Karen, Bo 18 Young, and Irene on January 22nd. 19 Who told you this information? 20 A That was -- that was after I had 21 the meeting with Karen on the 23rd, I 22 believe. 23 Q Okay. 24 A And that's when I found out that	1 sentences here in this second paragraph, 2 it talks about -- you know that Chon-Kim 3 is referring to Karen; correct? 4 A Yes, I do. 5 Q Okay. So the last sentence says 6 "Chon-Kim said that she was giving the 7 cash to another person, but that she was 8 afraid of that person and did not want to 9 reveal his name." 10 Do you see that? 11 A Yes. That's the information that 12 I got from Bo Young and Irene. 13 Q Okay. So it's your understanding 14 that Karen never mentioned James at that 15 January 22nd meeting with Bo Young and 16 Irene; right? 17 A Right. 18 Q Okay. 19 MR. YI: David, can we just 20 clarify one thing? I thought Ms. Lee had 21 testified earlier that Karen Chon was laid 22 off in October 2013 -- 23 MR. DZARA: Yes. 24 MR. YI: -- not November?	
1	they had a meeting -- a telephone 2 conversation prior to her meeting with me. 3 Q Okay. So after your meeting with 4 Karen on the 23rd -- January 23rd, 2014, 5 you learned that Karen had a meeting with 6 Bo Young and Irene on January 22nd; 7 correct? 8 A Yes. 9 Q And at that time, you learned 10 about what they discussed at that meeting? 11 A Yes. 12 Q And this second paragraph on page 13 2 is a summary of what you learned from 14 the January 22nd meeting from Bo Young and 15 Irene? 16 A Yes. 17 Q Okay. So this information that 18 you're providing to the FBI, or at least 19 this is a summary of what the FBI claims 20 that you told them during this 21 interview -- this information you received 22 from Bo Young and Irene? 23 A Yes. 24 Q Okay. So the last couple of	Page 158 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Page 160 1 MR. DZARA: She just clarified 2 that five minutes ago. 3 THE WITNESS: Yeah, there's two 4 dates. Here and here. 5 MR. YI: So she was indicating 6 October -- okay. 7 BY MR. DZARA: 8 Q Okay. Next paragraph, the third 9 paragraph of page 2, can you take a look 10 at that, and let me know if that's an 11 accurate summary of what you told the FBI. 12 A There is a typo. It should be 13 2013, not 2012 on January 23rd. 14 Q Okay. Got you. 15 A Yes. 16 Q Okay. How about the next 17 paragraph, which would be the fourth 18 paragraph on page 2? 19 A Yes. 20 Q Okay. How about the next 21 paragraph which is the fifth paragraph on 22 page 2 that carries over to page 3? 23 A Correct. Yes. 24 Q Okay. You'll see that in this

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<p>1 paragraph, the last sentence on page 2 2 that carries over to page 3, it says 3 "Chon-Kim had already begun her scheme, 4 and she shared her method with Ryu." 5 Do you see that? 6 A Yes. 7 Q So you testified before that you 8 weren't sure if Karen had come up with the 9 scheme and started it or that James had, 10 you know, helped her come up with the 11 scheme. 12 So does this help you remember 13 which one it was? 14 MR. YI: Objection to form. 15 THE WITNESS: Oh, yes, uh-huh. 16 BY MR. DZARA: 17 Q Okay. So what is your testimony 18 now? Did Karen come up with the scheme 19 first? 20 A Yes. She did mention in the 21 interview, and I think I did say that -- 22 that she -- during the interview, that she 23 was the one who came up with the method 24 and shared with James.</p>	<p>1 Is that the paragraph that you're 2 referring to? 3 Q Yes. Yes. 4 A Yes, that's true. 5 Q Okay. It's what you told -- it's 6 an accurate summary of what you told the 7 FBI? 8 A Yes. 9 Q Okay. How about the next 10 paragraph which is the second paragraph on 11 page 3? 12 A Yes. This is also a summary of 13 what I said to the FBI agent. 14 Q Okay. Next paragraph, just 15 paragraph 3 on page 3. 16 A Yes. Yes. 17 Q This is an accurate summary of 18 what you told the FBI? 19 A Yes. 20 Q Okay. This paragraph discusses 21 Karen's prior employment with Liberty Bank 22 between 2005 and 2006; correct? 23 A Yes. 24 Q And then Liberty Bank was</p>
<p>1 Q So it wasn't James's idea? 2 A No. 3 Q And the last sentence, it says 4 "Chon-Kim said that Ryu never communicated 5 with her via e-mail, but would call her 6 and use codes to tell her when to meet 7 with cash." 8 Do you see that? 9 A Yes. 10 Q Do you know what the codes -- do 11 you know anything about these codes? 12 A Well, from my understanding, it 13 was that if he needed \$20,000, he would 14 say, "20" -- 15 Q Okay. 16 A -- "Monday," things like that. 17 "I need \$20,000 by Monday," he said, "20, 18 Monday." That was my -- my understanding 19 at the interview. 20 Q Got it. Okay. How about the 21 next paragraph which is the first full 22 paragraph on page 3? Is that an accurate 23 summary of what you told the FBI? 24 A You mean that "Chon-Kim stated"?</p>	<p>1 acquired by Wilshire Bank; right? 2 A Yes. 3 Q And in here, it talks about 4 you -- it appears you told the FBI about a 5 prior incident where Karen -- \$10,000 was 6 missing from Karen's cash drawer while she 7 was at Liberty Bank; right? 8 A Yes. 9 Q And the sentence before says 10 "Karen's personnel records show that she 11 was consistently short on her cash drawer"? 12 A Yes. 13 Q And that Liberty Bank fired her 14 even though it had no evidence of fraud; 15 right? 16 A Yes. 17 Q And who did you learn this 18 information from? 19 A I had learned from one of my 20 staff who was at the site of the merger 21 with Liberty Bank. 22 Q Who from your staff? 23 A Might have been from Julie Ki. 24 Q So Julie Ki learned this and told</p>

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1	you about it?	1 A Julie told me because of the name 2 that she recognized when I told her that I 3 was investigating a case and that she 4 needed to be in charge and that person 5 involved Karen Chon. 6 Q Okay. So you told her you were 7 investigating something involving Karen 8 Chon? 9 A Yes. 10 Q And she said -- she responded at 11 some point soon thereafter with this 12 information about Karen's incident at 13 Liberty Bank? 14 MR. YI: Objection to form. 15 THE WITNESS: She might have, 16 yes. 17 BY MR. DZARA: 18 Q And you don't know if she just 19 remembered this information or if she went 20 and looked for documents, do you? 21 A It was something that she 22 remembered. 23 Q So she remembered that Karen's 24 personnel records at Liberty Bank showed
1	to Wilshire Bank during that merger process?	Page 168 1 that she was consistently short on her 2 cash drawer? 3 A Yes. 4 Q Julie, specifically, remembered 5 that? 6 A Julie told me there was an 7 incident at Liberty Bank when Wilshire 8 Bank merged -- acquired Liberty Bank, and 9 that they were investigating that case. 10 Although they didn't have hard evidence, 11 that they were suspecting Karen to be the 12 embezzler or -- so she remembers everything. 13 Q That's the second half of this 14 paragraph. I'm talking about the sentence 15 that says "Karen's personnel records show 16 that she was consistently short on her cash 17 drawer." 18 Your testimony is that -- hold on. 19 Your testimony is that you think Julie 20 remembered that and told you that? 21 A Yes. 22 Q That's quite a memory. 23 A Well, you would remember things 24 that are like shortage and anyone, you

	Page 169	Page 171
1	know, that are not properly behaving in a 2 banking environment. 3 Q Okay. Did you -- when you 4 learned this information from Julie, did 5 you tell anybody about Karen's past 6 employment with Liberty Bank and these 7 incidents? 8 A With the exception of the federal 9 agent, I might not have said this 10 information to anyone else. 11 Q So you told the FBI about this, 12 but you don't remember telling anybody at 13 Wilshire Bank? 14 A At Wilshire Bank, no. Well, I 15 would have told Orest since he was at the 16 interview with me. 17 Q Okay. So Orest was there. He 18 learned it? 19 A Yes. 20 Q But you don't remember telling 21 anybody else about it -- at Wilshire Bank 22 about it? 23 A No. 24 Q You didn't tell Elaine Jeon?	1 that Karen has a past incident of possibly 2 taking money from Liberty Bank; right? 3 A Yes. 4 Q Okay. Did you -- I mean, what 5 did you think about learning that she may 6 have a past incident at Liberty Bank of 7 taking money? Did it cause you to think 8 anything -- think about her differently 9 during your investigation? 10 MR. YI: Objection to form. 11 THE WITNESS: I don't understand, 12 think differently about her? I mean -- 13 BY MR. DZARA: 14 Q Yeah. What was your reaction to 15 learning that she may have stolen money 16 from Liberty Bank too? 17 A My reaction would be -- was that 18 -- oh, I mean, she -- she has a prior -- 19 prior incident, and now she has become a 20 bigger -- what is it? 21 Q Steal? 22 A Thief. 23 Q And that's it? 24 A Yeah, that's all I thought. I
1	1 A Oh, I might have told Elaine 2 Jeon, yes. 3 Q Okay. Anybody else? Maybe Lisa 4 Pai? 5 A I don't recall telling it to Lisa 6 Pai. I might have. 7 Q Do you think -- I mean -- 8 MR. YI: Can you we just instruct 9 the witness not to speculate? 10 THE WITNESS: Sorry. 11 BY MR. DZARA: 12 Q No. Okay. You said you may have 13 told Elaine Jeon, and you don't remember 14 telling anybody else; right? 15 A Right. 16 Q Do you know if Orest told anybody 17 else at Wilshire Bank? 18 A I don't know. 19 Q Okay. So Karen admitted to 20 embezzling money from BankAsiana; right? 21 A No. She -- yes, BankAsiana. I'm 22 sorry about that. 23 Q Okay. Then as you're in this 24 investigation, you find out from Julie	1 don't know what else I would think. 2 Q Did you think that was something 3 really important that you should tell 4 Elaine or somebody else at Wilshire Bank? 5 Did you think "This is" -- "she's had a 6 past incident of maybe stealing. I've got 7 to tell somebody"? 8 A No. It was just a regular 9 communication -- I mean, information that 10 I heard, might be of no interest or help 11 to the investigation. 12 Q Okay. Okay. Next paragraph, can 13 you look? It's the fourth full paragraph 14 on page 3. 15 A Yes. 16 Q Is that an accurate summary of 17 what you told the FBI? 18 A Yes. 19 Q Okay. How about the next 20 paragraph? It starts with "Lee said that 21 in her discussions with"? 22 A Yes. 23 Q Is that accurate, what you told 24 the FBI?

	Page 173	Page 175
1	A Yes.	never found out.
2	Q Okay. This paragraph says that	Q How about the next paragraph?
3	you found that there was potentially a	Take a look and let me know if this is an
4	romantic relationship between James and	accurate summary of what you told the FBI.
5	Karen based on your discussions with	A Yes, this is accurate.
6	employees at BankAsiana that worked with	Q Okay. The last sentence is that
7	them; right?	you did not find suspicious cash deposits
8	A Correct.	in James's account; correct?
9	Q Who told you -- what BankAsiana	A Yes.
10	employees told you that there was	Q Okay. Did you ever find any
11	potentially a romantic relationship	suspicious cash deposits in James's
12	between James and Karen?	account during your part of the
13	A I don't recall who told me,	investigation?
14	specifically, who had relationship with	A Not during my investigation, no.
15	him -- or with her.	Q At any other time, did you find
16	Q You don't remember who told you,	out?
17	specifically?	A No. I didn't investigate after
18	A No, I don't remember.	that.
19	Q Did you think this was important	Q Okay. How about the next
20	in your investigation, a possible romantic	paragraph which is the second-to-last
21	relationship between James and Karen?	paragraph on page 3?
22	A Yeah, at that time, I thought it	A Yes, that's correct.
23	could be important for them to look at it.	Q Okay. And then we talked about
24	Q For who to look into it?	these two issues before, the employee
	Page 174	Page 176
1	A For the FBI agent to investigate.	loan. You testified -- your testimony
2	Q Did you ever find out one way or	before is everything you know about the
3	another or conclude one way or another if	employee loan?
4	there was a romantic relationship between	A Can you repeat that question?
5	James and Karen?	Did I testify what?
6	A No. I never found out whether	Q You previously testified about
7	they were ever romantic.	this employee loan; right?
8	Q Okay. How about the last	A Yes.
9	sentence here? You say that "There's	Q And I don't want to ask anymore
10	rumors that Karen spent a lot of time	questions about it. I just want to know
11	gambling."	is the testimony that you gave before
12	Who did you -- how did you learn	everything you knew about the employee loan
13	that?	issue?
14	A This was also told -- something	A Yes.
15	that was told to me by employees from	Q Okay. And the computers -- you
16	either BankAsiana or anyone that worked	testified before that you were aware that
17	with her before.	James and Mr. Hur took their computers?
18	Q Okay. Do you remember who,	A Yes.
19	specifically?	Q Okay. And you testified before
20	A No, I don't.	that -- I'm not going to characterize or
21	Q Do you know -- did you ever find	repeat your testimony from before about
22	out if Karen -- if this was true, if Karen	the computers. But my question is: The
23	spent a lot of time gambling?	testimony you gave before about the
24	A I don't have that information. I	computers is everything you know about the

	Page 177	Page 179
1	computers; correct?	1 accurate summary of what Ms. Chon told 2 them on February 4, 2014, and I'm going to 3 read you these three paragraphs, and you 4 can read along with me. But I'm going to 5 read them into the record.
6	A Yes, uh-huh. 7 Q Okay. How about the last 8 sentence that's at the bottom of page 3, 9 carries over to page 4? 10 A Yes, it's correct. 11 MR. DZARA: Okay. Now, I want to 12 show you one more document, and we can 13 talk about taking a lunch break for you 14 guys because I don't want to starve you, 15 but I don't think I have a lot more. 16 Michael, can you pull out the FBI 17 memo marked Ryu 20? 18 BY MR. DZARA: 19 Q Take a look at it for a couple 20 seconds, Ms. Lee, and tell me when you're 21 ready. I'll direct you to -- I don't want 22 you to read the whole thing. I'll direct 23 you where I want you to read. 24 A I'm ready. 25 Q This is an exhibit marked Ryu 20. 26 It was previously marked at Lisa Pai's 27 deposition and was produced by Karen Chon. 28 This is the FBI memo of its interview of	6 "James Ryu was not involved in 7 the scheme to steal money from the CD 8 accounts. Chon last met with James Ryu on 9 or about Thursday, January 30, 2014. Chon 10 and Ryu met at the Englewood Diner. Chon 11 apologized to James Ryu for all the 12 trouble he was experiencing with Wilshire 13 Bank. Chon admitted to Ryu that Chon had 14 lied to bank auditors about Ryu being 15 involved in the scheme to take money from 16 the CD accounts. Chon told Ryu that Chon 17 was going to tell the truth and clear Ryu 18 of wrongdoing. 19 "Ryu did not threaten Chon in any 20 way. During this meeting, Ryu laughed at 21 the situation in disbelief. Ryu appeared to 22 be shocked. 23 "Chon lied about James Ryu's 24 involvement because the bank auditor
1	Karen Chon on February 4th. 2 Do you see at the bottom left 3 corner, it says "Investigation on February 4 4, 2014"?	1 suggested to Chon that Ryu was involved. 2 The auditors seemed to suspect Ryu from the 3 beginning. They did not believe that Chon 4 accomplished the scheme by herself. Chon 5 agreed with the auditors that James Ryu 6 was involved." 7 Did I read that correctly? Did I 8 read that correctly? 9 A Yes. 10 Q Okay. So this is the first time 11 you heard this. 12 What's your reaction to what I've 13 just read and what's provided in this 14 report? 15 A My reaction to the report -- I 16 mean, to what you just said? 17 Q Yeah. This has been represented 18 as to -- an accurate summary of what Karen 19 Chon told the FBI on February 4th. 20 Now, you interviewed with them on January 21 28 -- right? -- 2014? 22 A Yes. 23 Q So now, this is a couple days 24 later, and you're reading this.

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1	A Yes.	1 the FBI -- you think she lied to the FBI
2	Q This is completely opposite of	2 in what I just read to you?
3	what she told you at your January 23rd	3 A Yeah, I think she lied to the FBI
4	meeting; right?	4 after meeting with James Ryu.
5	A Yes.	5 Q What's your basis for that? What
6	MR. YI: Objection to form.	6 do you mean by "after meeting with James
7	BY MR. DZARA:	7 Ryu"?
8	Q So what's your reaction right now	8 A Well, maybe I don't -- the thing
9	to reading this, that this is completely	9 is --
10	opposite of what she told you? She's	10 Q I don't want you to guess.
11	saying that she lied to you. What's your	11 Remember, I don't want you to guess.
12	reaction?	12 A Yes.
13	MR. YI: Objection to form.	13 Q But you just said --
14	THE WITNESS: I mean, if this	14 MR. YI: Well, let her answer,
15	statement is true, then she had us leading	15 please.
16	for something that was totally not true.	16 THE WITNESS: When I met with
17	BY MR. DZARA:	17 Karen, she was very, very remorseful for
18	Q Okay. Were you -- your testimony	18 what she did. And I don't believe at that
19	is you weren't aware she testified to the	19 time, she would involve someone -- that
20	FBI -- that she gave this statement to the	20 she would try to incriminate somebody that
21	FBI?	21 was totally not involved in this situation
22	A No, I wasn't aware.	22 because she wanted to get away. That
23	Q Okay. So you're saying if this	23 would be my belief. I mean, you don't
24	is true, then she -- you just testified if	24 incriminate someone just because you felt
	Page 182	Page 184
1	this is true, then she lied to you during	1 like it at that time.
2	the January 23rd meeting; right?	2 BY MR. DZARA:
3	A Right.	3 Q Well, let me stop you there.
4	Q Okay. What do you think is true?	4 A I believe there should be some
5	This statement, this summary of what she	5 truth in the statement that she was
6	told the FBI or what she told you on	6 giving. And also she was very
7	January 23rd?	7 cooperative, and she did admit to the
8	MR. YI: Objection to form.	8 crimes. I mean, she said she's the one
9	BY MR. DZARA:	9 who stole the money. But she also
10	Q It's a tough question to answer;	10 commented that she did not take possession
11	right?	11 of the money to herself, that some of them
12	A Yeah.	12 was given to Mr. James Ryu.
13	MR. YI: Objection to form.	13 Q Do you know if they ever -- if
14	THE WITNESS: Well, I mean, I'm	14 anybody ever concluded that James had any
15	just reading this report. To my	15 of the money?
16	knowledge, what she has told me at that	16 A No, I don't have any evidence.
17	time and at the interview seems to be the	17 Q You don't know if any of the
18	truth that she was telling me.	18 money was ever found with James Ryu; right?
19	BY MR. DZARA:	19 A I don't -- I don't have any
20	Q Okay. So you believe -- you	20 evidence of whether, you know, the money
21	believe that she told the truth to you and	21 was found with James Ryu or not.
22	that this is a lie? "Yes" or "No"?	22 Q Okay. So your reason why --
23	A Yes.	23 let's take this in pieces. Your reason
24	Q So you think this statement to	24 why you think this is a lie, what I just

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1	read to you and why she was telling you 2 the truth on January 23rd, is that she was 3 remorseful. That's what you said; right? 4 A Yes. 5 Q And then you said why would she 6 implicate somebody else if they weren't 7 involved? 8 A Correct. 9 Q And she said, "I didn't keep all 10 the money. I gave it to James"? 11 A Yes. 12 MR. YI: Objection to form. 13 BY MR. DZARA: 14 Q Okay. And now you just testified 15 that you know of no evidence that has 16 proven that James has any of the money; 17 right? 18 MR. YI: Objection to form. 19 THE WITNESS: Yes. 20 BY MR. DZARA: 21 Q Okay. So that's number three of 22 what you testified. The third reason why 23 you believed her. 24 And the second reason was why	1 either. Is that your testimony? 2 MR. YI: Objection to form. 3 That's not what she said. Go ahead. 4 THE WITNESS: That's not what I 5 said. 6 BY MR. DZARA: 7 Q Okay. What's the basis -- I'm 8 trying to understand why you believe her 9 if -- you're saying she wouldn't -- why 10 would she implicate James if he wasn't 11 involved; right? That doesn't make sense 12 to you; right? 13 A Doesn't make sense to me. 14 MR. YI: Objection to form. 15 BY MR. DZARA: 16 Q Okay. Doesn't make sense to you; 17 right? 18 A Correct. 19 Q But you can't -- you've got Karen 20 here who admits to stealing money, says it 21 was her scheme. It's previously -- 22 there's suspicion that she stole money 23 from Liberty Bank. You've got no evidence 24 linking James. You've testified you know
1	would she implicate somebody if they 2 weren't involved. 3 You, Alicia Lee -- you wouldn't 4 implicate somebody if they weren't 5 involved; right? 6 If you stole money, you 7 personally wouldn't implicate somebody; 8 right? 9 A Yes. 10 MR. YI: Objection to form. I 11 don't know where this is going. 12 MR. DZARA: Doesn't matter, 13 Michael. Just object to form. That's it. 14 BY MR. DZARA: 15 Q So if you stole money, you 16 wouldn't implicate somebody if they 17 weren't involved; right? 18 A Right. 19 MR. YI: Objection to form. 20 BY MR. DZARA: 21 Q Okay. Karen -- you're saying -- 22 so your opinion is because you wouldn't 23 implicate somebody if they weren't 24 involved if you stole money, she wouldn't	1 of no other evidence linking James to this 2 embezzlement other than her word. Yet you 3 still believe her that he was involved? 4 MR. YI: Objection to form. 5 Asked and answered. You're being 6 argumentative. Let's move on. 7 MR. DZARA: Michael. Answer the 8 question. Stop objection. 9 MR. YI: All right. You want to 10 get on a call with Judge -- Magistrate 11 Judge Dixon? I'm ready. 12 MR. DZARA: Michael, I'm asking 13 her a question. She's allowed to answer it. 14 MR. YI: I've let you ask it a 15 number of times. You're being 16 argumentative now. You're not asking for 17 information. You're trying to now cross- 18 examine this witness. This is not a 19 trial. This is a deposition. You're being 20 argumentative. 21 MR. DZARA: Isabel, can you read 22 back the question, please, and have the 23 witness answer? 24 (Record read.)

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1	BY MR. DZARA: Q And I'll say this in a nonargumentative tone. Your testimony today and the fact -- well, let me strike. Let me start over. Karen admitted to embezzling from BankAsiana; correct?	1 the CEO of the bank, Mr. Hur, had approached Irene Lee to take a loan from the bank to give it to Mr. Ryu which is unethical. BY MR. DZARA:
2	A Yes. Q Karen was suspected of stealing money from Liberty Bank; correct?	2 Q Okay. Do you know if Mr. Ryu asked Mr. Hur to do that? A I'm sorry. Could you repeat the question? Q You said Mr. Hur asked Irene for an employee loan to give money to James. Do you know if James asked Mr. Hur to do that?
3	A Yes. Q Karen -- the only evidence that you know of -- not Wilshire Bank. I'm talking about you. The only evidence linking James to the embezzlement was Karen's statement to you on January 23rd, 2014; correct?	3 A During the statement -- during the interview, Irene was asked by Mr. Hur. And after that when Mr. Ryu found out, according to Irene, he was embarrassed because he had asked for the money to Mr. Hur directly, not to ask Irene to take a loan. Q Okay. So you're saying that James never asked Mr. Hur to ask Irene for an employee loan; right?
4	A Yes. MR. YI: Objection to form.	4 A Yes. That's according to Irene
	Page 190	Page 192
1	BY MR. DZARA: Q So Karen is in jail -- right? -- for her crimes? A Yes. Q Okay. Taking all that into account right now today, do you still believe Karen's statement that James was involved in the embezzlement?	1 Lee's statement, yes. 2 Q Okay. So now you just gave all 3 that testimony in response to my question 4 of why do you still believe Karen that 5 James was involved. And you just gave all 6 this testimony about James needing money; 7 right? So you're giving -- are 8 you trying to say that there was motive 9 for James to be involved? 10 A Yes. 11 Q Okay. But you're just 12 speculating; is that right?
2	MR. YI: Objection to form. Asked and answered. Go ahead.	13 MR. YI: Objection to form. 14 THE WITNESS: That's my belief.
3	THE WITNESS: During the interview with Karen, it wasn't only Karen who had given me information about James Ryu's financial difficulty, how he was approaching other employees to borrow money, and that he had other borrowing relationships with clients and brokers around the area, and that everyone at BankAsiana knew about it. And even with	15 BY MR. DZARA: 16 Q That's your belief? 17 A Yes. 18 Q Okay. You reviewed James's finances. 19 Did you see any financial problems in his finances? 20 MR. YI: Objection to form. 21 Assuming facts not in evidence. 22 THE WITNESS: I did not review --

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1	MR. DZARA: She reviewed his account.	1 Lee -- or Irene Lee and Bo Young when they 2 talked about James's financial problems. 3 And you testified that you didn't 4 review any financial records to support 5 what they were saying about James's 6 financial condition; is that correct? 7 MR. YI: Objection to form. 8 THE WITNESS: Yes. 9 BY MR. DZARA: 10 Q Okay. Thank you. Okay. So you 11 believed everything Irene and Bo Young 12 said about James's financial condition; 13 right? 14 MR. YI: Objection to form. 15 THE WITNESS: No, I did not find 16 any evidence during my review of the 17 accounts that were at BankAsiana and later 18 on at Wilshire Bank, no. 19 BY MR. DZARA: 20 Q Okay. I'm saying you didn't 21 review any other accounts besides Wilshire 22 Bank and BankAsiana -- right? -- of James? 23 A No, I did not. 24 Q So you didn't -- did you find any	10 11 12 13 14 15 16 17 18 19 20 21 22 23 24
1	evidence -- any financial records, banking records to support what you heard from Eileen and Bo Young or whoever about James's financial problems? 2 MR. YI: Objection to form. 3 THE WITNESS: No, I did not find any evidence at BankAsiana. 4 BY MR. DZARA: 5 Q Okay. So you were just believing what they said out of hand? You just believed them? 6 MR. YI: Objection to form. 7 Starting to be argumentative, again. I'm not sure that's the purpose here. 8 But go ahead if you can answer. 9 THE WITNESS: Yes. 10 MR. DZARA: Michael, let's go off the record. 11 (A discussion was held off the record.) 12 BY MR. DZARA: 13 Q So Ms. Lee, I just asked the questions regarding the basis of your belief or the basis of your believing Ms.	10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	

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1	going on like the financial information Bo 2 Young and Irene said at the January 23rd 3 meeting." 4 Is there anything else, any other 5 reasons why you think -- that support and 6 form the basis of why you believe Karen was 7 lying to the FBI in this memo? 8 MR. YI: Objection to form. 9 THE WITNESS: I don't have any 10 other. 11 BY MR. DZARA: 12 Q Nothing else? 13 A No. 14 Q Okay. Thank you. So one 15 specific question here. It says, the last 16 paragraph I read, that "Chon lied about 17 James Ryu's involvement because the bank 18 auditor suggested to Chon that Ryu was 19 involved." 20 MR. YI: I'm sorry to interrupt. 21 You said you were going to give us a 22 break. Just let us know when you're ready 23 to give us a break. 24 MR. DZARA: Yeah, I just have a	Page 198	Q So that's a lie? Okay. A Yes. Q So you're aware -- you said you know that Karen met with Bo Young and Irene on June 22nd, and then she met with you, Bo Young, and Irene on -- or January 22nd and she met with you, Bo Young, and Irene on January 23rd; right? A Yes. Q And I think you testified you're not aware of her meeting with anybody else affiliated with Wilshire Bank -- A Yes. Q -- as part of the investigation? She didn't meet with anybody else at Wilshire Bank as part of the investigation; right? A The knowledge that I have, no, as far as I know. Q All right. So I guess -- I'm not asking you to guess here. But she's got to be referring to you in this statement -- right? -- this sentence? MR. YI: I'm going to instruct
1	couple of questions about this, and then 2 we're done with this exhibit. 3 MR. YI: Okay. 4 MR. DZARA: Thank you. 5 BY MR. DZARA: 6 Q So this sentence, "Chon lied 7 about James Ryu's involvement because the 8 bank auditor suggested to Chon that Ryu 9 was involved." Do you see that? 10 A Yes, I see that. 11 Q Okay. Do you know what bank 12 auditors -- who were the bank auditors 13 that she met with? 14 A I have no idea because she had 15 met with me, but she never met with Orest. 16 So that statement alone itself is a lie to me. 17 Q Can you repeat that? I didn't 18 understand the last part. 19 A I'm not an auditor, and she never 20 met with Orest. And if she gives a 21 statement saying that the bank auditor 22 suggested that James Ryu was involved, 23 that's a false statement.	Page 200	the witness not to speculate. If she knows. THE WITNESS: I have no idea whether she's referring to me or not because I'm not an internal auditor. MR. DZARA: Okay. That's all the questions I have for this, Michael. Off the record. (Record read.) BY MR. DZARA: Q You were just handed an exhibit previously marked Ryu 12, and it's Bates-numbered WB 795 through 808. My first question is: Upon looking at it, have you ever seen it before? A No, I haven't. Q Okay. Well, this was an initial -- there's two investigation audit reports that were produced by Wilshire Bank here in this case, and it's my understanding that Orest drafted them. Now, I haven't deposed Orest, but based on what I know about this case, I think he's the one that drafted them.

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1	But you're specifically mentioned 2 a lot in this report because I think some 3 of the information Orest learned came from 4 you. So I want to direct you to -- it's 5 page 2 of the report, WB 798.	1 Bank, and you testified that you learned 2 about that from Julie Ki; right? 3 A Yes. 4 Q Okay. So this is saying that 5 discussion was with Jennie Han. 6 Do you know -- who is Jennie 7 Han? Do you know her?
6	MR. YI: David, may I make a 7 suggestion? 8 MR. DZARA: Sure. 9 MR. YI: Do you want show her 10 both -- both reports, the one from -- 11 MR. DZARA: No. I'm just going 12 to do one at a time. That's all. 13 MR. YI: All right. 14 MR. DZARA: I'm not sure if I 15 have any questions about the second one, 16 Michael. 17 MR. YI: All right. Go ahead. 18 MR. DZARA: Thank you. 19 BY MR. DZARA: 20 Q Okay. So are you at page 2, WB 21 798? 22 A Yes. 23 Q Okay. Towards the, you know -- 24 maybe one-third of the way down, there is	8 A Jennie Han is our HR manager. 9 Q Okay. Were you aware that 10 someone, Orest or somebody else, at W -- 11 at Wilshire Bank talked to Jennie Han 12 about this suspected -- Karen-suspected, 13 you know, situation with Liberty Bank? 14 A I'm not aware. 15 Q Okay. Because this is -- you 16 said you learned from Julie Ki. This 17 apparently seems to be -- is stating that 18 Jennie Han was the source of this 19 investigation; right? 20 MR. YI: Objection to form. 21 THE WITNESS: So you're asking me 22 if my source was just Julie Ki, or was it 23 Jennie Han? 24 BY MR. DZARA:
1	sentence that begins with "Discussion with 2 Jennie Han human resource manager." 3 Do you see that? 4 MR. YI: I'm just going to point 5 if that's okay? 6 MR. DZARA: Okay. 7 THE WITNESS: Okay. Yes. 8 BY MR. DZARA: 9 Q Okay. So that sentence says -- 10 I'm going to read it. "Discussion with 11 Jennie Han human resource manager revealed 12 that Karen was a former WB employee 13 acquired in the Liberty Bank of New York 14 merger in 2006. At that time, Karen left 15 the bank through maternity leave under a 16 cloud of suspicion since she and/or her 17 employees allegedly had several cash 18 shortages of which \$10,000 was the 19 largest." 20 Did I read that correctly? 21 A Yes. 22 Q Okay. This is similar to what we 23 looked at before -- what you told the FBI 24 about Karen's prior suspicion at Liberty	1 Page 202 2 Q Yeah. Your source was Julie 3 Ki -- right? -- for the Liberty Bank 4 information? 5 A At the time when I was at -- 6 before I left California to go to New 7 Jersey, that was my source. This could 8 have been added to the statement afterwards. 9 Q Okay. So you're not aware of any 10 discussion? You never talked to Jennie Han 11 about the Liberty Bank and Karen incident? 12 A I might have discussed it 13 afterwards, yes. 14 Q Okay. So one clarification 15 question. When did Julie Ki tell you 16 about Karen and Liberty Bank? Was it 17 before you left for New Jersey or while 18 you were in New Jersey? 19 A I don't know the exact date, but 20 it was before I came back from New Jersey. 21 Q I'm saying, she didn't tell you 22 before you flew out to New Jersey, did she? 23 A I don't know whether she told me 24 before or she told me after, but it was before I got back from New Jersey. That's

	Page 205	Page 207
1	for sure.	1 Do you know if James returned the 2 computers to Wilshire Bank? 3 A I don't know. 4 Q Okay. You understand that it's 5 the bank's position -- now Bank of Hope, 6 formerly Wilshire Bank. It's their 7 position and their belief that James was 8 involved in the embezzlement; correct? 9 A Yes. 10 MR. DZARA: Okay. All right. 11 Let me look at the next one and see if I 12 have anymore questions on the next report, 13 Michael. 14 MR. YI: Okay. 15 MR. DZARA: Give me 20 seconds. 16 Okay. I just have a couple, 17 Michael. I'm sorry. 18 So can you show her -- hand her 19 a copy. 20 MR. YI: I already did. She 21 started reviewing it already. 22 MR. DZARA: Okay. Thank you. 23 BY MR. DZARA: 24 Q All right. So this next exhibit
1	A I don't know. Q You didn't know that? A No. Q Do you know that James denied any involvement in the embezzlement when he met with Lisa? A Since I didn't know whether they met or not, I don't know what was the outcome of the interview. Q Okay. Do you know -- sitting here today, do you know that James has denied any involvement in the embezzlement? A Well, you just said it. Q Other than me -- no. I'm saying right now aside from this document. Sitting here today right now, are you aware that James has denied any involvement in the embezzlement? A No, I'm not aware. Q Other than me saying that, you're not aware of it? A Yeah, uh-huh. Q Okay. Thank you. And we talked about the computers before briefly.	Page 206 1 that Michael just you handed to you 2 graciously is previously marked Ryu 13. 3 It's Bates-numbered WB 810 through 817. 4 A No. This is Ryu 12. It's not 13. 5 MR. YI: Sorry. 6 THE WITNESS: Uh-huh. Okay. 7 MR. YI: She now has 13. 8 MR. DZARA: Great. Thank you. BY MR. DZARA: 10 Q Just take a look for a couple 11 seconds. My first question is going to be 12 have you ever seen this before? 13 A No. 14 Q Okay. I'm going to direct you 15 to -- well, I'm going to direct you to page 16 3. The second paragraph, it begins with 17 "On February 4th." 18 MR. YI: Which page? 19 MR. DZARA: Are you there, 20 Michael? 21 THE WITNESS: Page 3. 22 MR. DZARA: Page 3. 23 MR. YI: Sorry. Go ahead. BY MR. DZARA:

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1	<p>Q So the paragraph that begins "On 2 February 4th," the second-to-last sentence 3 begins "It was also learned when Karen was 4 a former WB employee through the Liberty 5 Bank of New York merger and experienced a 6 \$10,000 cash shortage that branch 7 employees searched her purse and found 8 \$4,000 in cash."</p> <p>9 Do you see that?</p> <p>10 A So you're reading in the middle 11 of the paragraph; right?</p> <p>12 Q Yeah, second-to-last sentence.</p> <p>13 A Yes.</p> <p>14 Q Okay. So again, this is 15 discussing the Karen, Liberty Bank cash 16 shortage issue. The new part of this that 17 wasn't in your FBI -- what you said to the 18 FBI and in the last exhibit that we looked 19 at has here that branch employees searched 20 Karen's purse and found \$4,000 in cash.</p> <p>21 Do you have any information about 22 that or know anything about that?</p> <p>23 A No, I don't.</p> <p>24 Q Okay. This is the first time --</p>	<p>1 Do you -- were you -- did you 2 investigate any Gae that Karen was part of 3 to see if it was involved in the 4 embezzlement?</p> <p>5 A No, I didn't.</p> <p>6 Q Okay. Were you aware that 7 Wilshire Bank was investigating that?</p> <p>8 A No, I wasn't.</p> <p>9 Q Okay. Okay. Were you aware that 10 Wilshire Bank seized the bank account 11 James had with Wilshire Bank when the 12 embezzlement came to light?</p> <p>13 A Yes, I was aware.</p> <p>14 Q How did you learn about that?</p> <p>15 A I don't know whether I was the 16 one who put the seize on it or it was one 17 of my colleagues, but I was instructed to 18 do it.</p> <p>19 Q Okay. Who instructed you to do 20 it?</p> <p>21 A Was upper management, probably my 22 boss.</p> <p>23 Q Do you think Elaine Jeon 24 instructed you to do it?</p>
1	<p>is this the first time you're learning 2 about it, reading it here?</p> <p>3 A Yes. Reading it here, yes.</p> <p>4 Q Okay.</p> <p>5 A I have no recollection.</p> <p>6 Q All right. Can we go to the last 7 page, page 8, please? The last sentence 8 of this report begins with "By virtue of 9 the \$30,000 check."</p> <p>10 Do you see that sentence?</p> <p>11 A Yes.</p> <p>12 Q Okay. This is talking about Gae, 13 G-a-e. Can you just tell me what is a 14 Gae -- Korean Gae?</p> <p>15 A How would I explain Gae? It's a 16 group of people that facilities funds on 17 terms of paying interest, something like 18 that.</p> <p>19 Q Okay. And it's a -- for lack of 20 a better term, it's a Korean thing; right?</p> <p>21 A Yes.</p> <p>22 Q Okay. So this sentence ends with 23 "The Gae's involvement in this 24 embezzlement cannot be ruled out."</p>	<p>1 Page 210</p> <p>2 A Either Elaine or Lisa. I don't 3 have exact recollection, but it would have 4 been any one of those two.</p> <p>5 Q And do you know why they decided 6 to freeze or put the hold on the James's 7 account?</p> <p>8 A No, I don't know why they had. I 9 was just following instructions.</p> <p>10 Q Okay. But you weren't involved 11 in the decision-making. You were just 12 told to do it?</p> <p>13 A No, I wasn't involved in the 14 decision-making. I was just told to do it.</p> <p>15 Q We talked about New Millennium 16 Bank before.</p> <p>17 What's your understanding of -- or 18 do you know New Millennium Bank?</p> <p>19 A It was mentioned while I was at 20 New Jersey, and also I learned about it 21 after with the communication and 22 information that I got in researching Mr. 23 Ryu's account.</p> <p>24 Q Okay. Is that your only knowledge of anything having to do with</p>

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<p>1 New Millennium Bank?</p> <p>2 A No.</p> <p>3 Q But that's your only knowledge of</p> <p>4 them? You don't know anything else about</p> <p>5 them?</p> <p>6 A Yes, that's my only knowledge.</p> <p>7 I'm sorry.</p> <p>8 Q Are you aware of any</p> <p>9 communications between anyone from</p> <p>10 Wilshire Bank with anyone at New</p> <p>11 Millennium Bank about James in or around</p> <p>12 January, February, March 2014?</p> <p>13 A No, I'm not aware of any of that.</p> <p>14 MR. DZARA: Okay. Michael, can</p> <p>15 you show her the last exhibit, the</p> <p>16 litigation hold?</p> <p>17 MR. YI: David, just for the</p> <p>18 record, Exhibit 13 and 14 were clipped</p> <p>19 together by one of the folks that works</p> <p>20 here. You didn't want to ask her about</p> <p>21 Exhibit 14; right?</p> <p>22 MR. DZARA: Let me go back and</p> <p>23 see what Exhibit 14 was. What is 14,</p> <p>24 Michael?</p>	<p>1 Q Okay. Do you remember receiving</p> <p>2 it from Lisa Pai?</p> <p>3 A I don't recollect receiving it</p> <p>4 from Lisa Pai, no.</p> <p>5 Q Okay. That's fine. All right.</p> <p>6 I think I don't have anymore questions</p> <p>7 other than -- do you -- we talked a lot</p> <p>8 about the embezzlement, a lot about your</p> <p>9 role in the investigation.</p> <p>10 Do you think that you told me</p> <p>11 everything that you recall about the</p> <p>12 investigation into Karen's</p> <p>13 embezzlement?</p> <p>14 A What I recall? Yeah, I believe I</p> <p>15 told you everything that I recall at this</p> <p>16 time.</p> <p>17 MR. DZARA: Okay. Great. Thank</p> <p>18 you. That's all the questions I have.</p> <p>19 Thank you so much for your time today. I</p> <p>20 really appreciate it.</p> <p>21 THE WITNESS: You're welcome.</p> <p>22 (The deposition proceedings were</p> <p>23 concluded at 2:24 p.m.)</p>
<p>1 MR. YI: They're handwritten</p> <p>2 notes of Lisa Pai's meeting with Karen</p> <p>3 Chon.</p> <p>4 MR. DZARA: Oh, no. That may</p> <p>5 have -- no. That may have accidentally been</p> <p>6 in the PDF.</p> <p>7 MR. YI: Okay.</p> <p>8 MR. DZARA: Someone might have</p> <p>9 merged these together on my end when we</p> <p>10 scanned the exhibits. So no, I did not.</p> <p>11 You can trash them or shred it. You know,</p> <p>12 take it away with you.</p> <p>13 MR. YI: Okay. I just wanted to</p> <p>14 make sure.</p> <p>15 MR. DZARA: Yeah, thank you.</p> <p>16 That's completely accidental.</p> <p>17 BY MR. DZARA:</p> <p>18 Q Okay. You should have in front</p> <p>19 of you an exhibit that's been previously</p> <p>20 marked Ryu 31, WB 939?</p> <p>21 A Yes.</p> <p>22 Q My first question is going to be:</p> <p>23 Have you ever seen this document before?</p> <p>24 A No.</p>	<p>Page 214</p>

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WITNESS CERTIFICATION

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I hereby certify that I
have read the foregoing transcript of
my deposition testimony, and that my
answers to the questions propounded,
with the attached corrections or
changes, if any, are true and
correct.

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DATE ALICIA LEE

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PRINTED NAME

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FILE #13270

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Bank of Hope, ET AL

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vs.

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Miye Chon, ET AL

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CERTIFICATE

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I, MARIA ISABEL DELUNA, a Certified
Shorthand Reporter in and for the State of
California, do hereby certify:

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That the foregoing witness by me
was duly sworn; that the deposition was then
taken before me at the time and place herein
set forth; that the testimony and proceedings
were reported stenographically by me and
later transcribed into typewriting under my
direction; that the foregoing is a true
record of the testimony and proceedings taken
at that time.

15

16

IN WITNESS WHEREOF, I have
subscribed my name on this date:

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MARIA ISABEL DELUNA,
CSR NO. 13986